Suffolk Coastal Local Plan Examination

Hearing Day 1

Matter 2A Housing Provision

Note on specialist and older persons housing

Introduction

1. This note responds to an action arising in the hearing session on Matter 2A Housing Provision (Tuesday 20th August, PM) to provide further information for the Inspector in relation to needs for housing for older people and the needs for specialist accommodation. The note is being produced in advance of Hearing Day 8 (Wednesday 18th September), Matter 4, Policies, which will include consideration of Policy SCLP5.8 Housing Mix.

2. Question 2.5 of the Inspector’s Matters, Issues and Questions asked, “Does the Plan adequately address the needs of different groups in the community as set out in paragraph 61 of the Framework?”. The Council provided a response in relation to each of the groups set out in paragraph 61 of the National Planning Policy Framework (NPPF). The Council’s response in relation to Older People is set out in paragraphs 38 – 43 of the Matter 2A Statement and the Council’s response in relation to Specialist Housing is set out in paragraphs 44 – 46 of the Statement.

3. The Council’s responses refer to the Strategic Housing Market Assessment Volume 2 (Document D15) through which needs for specialist and older persons accommodation needs have been assessed. The needs are set out in the supporting text to Policy SCLP5.8 Housing Mix in the Final Draft Local Plan (Document A1, page 92, paragraph 5.42). Policy SCLP5.8 sets out policy on housing mix and includes:

   “Sheltered and extra-care housing will be supported where the scheme incorporates a mix of tenures and sizes to meet an identified need.”

Planning Practice Guidance – Housing for Older and Disabled People

4. In June 2019, new Planning Practice Guidance (PPG) was published by the Government specifically related to Housing for Older and Disabled People. The publication of this PPG places an increased emphasis on planning to meet the needs for specialist accommodation for older people. In particular, it refers to the future need for specialist accommodation for older people being broken down by tenure and type (Paragraph: 004 Reference ID: 63-004-20190626).
5. The PPG (Paragraph: 010 Reference ID: 63-010-20190626) states that specialist housing for older people can include age restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care and residential care homes and nursing homes.

6. The PPG (Paragraph: 012 Reference ID: 63-012-20190626) states that “Plans need to provide for specialist housing for older people where a need exists”. The PPG goes on to state that “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.” The PPG does not require plans to allocate sites for specialist housing although does identify that this may be appropriate where it would provide certainty and would encourage provision in suitable locations.

7. The Inspector has referred to the PPG in the hearing session on Matter 2A and has asked the Council to consider the needs for specialist accommodation needed for older people in this respect.

**Strategic Housing Market Assessment**

8. HDH Planning, the authors of the Strategic Housing Market Assessment Volume 2 and the later Partial Update (Documents D15 and D16) have therefore provided a disaggregation of housing needs for older people, to reflect the guidance of the new PPG. In relation to general (i.e. non specialist) housing this is based upon the population profile set out in the Strategic Housing Market Assessment – Part 2 Partial Update (Document D16) related to the 2014-based household projections. In relation to Sheltered Housing and Enhanced Sheltered / Extra Care Housing, this is based upon the outputs from the Strategic Housing for Older People (SHOP) tool. The note demonstrates how the categories correspond with the types of specialist housing for older people referred to in paragraph 10 of the PPG. The needs for specialist housing form part of the overall housing requirement (paragraph 6.11 of the SHMA Part 2, Document D15, page 93).

9. The disaggregation shows that the needs for older persons specialist housing relate to smaller dwellings (one and two bedroom properties) across market and affordable tenures, with the greatest need being for one bedroom properties. This assessment is provided as Appendix 1 to this note.

10. Information is available also on the affordable and market components of the existing stock, as set out in Appendix 2 to this note.

11. The numerical needs should be viewed in the context of the explanation in SHMA Part 2 (Document D15, paragraph 6.11, page 93) which states that the actual numbers and type of specialist accommodation need may depend on changes in patterns of demand and expectations. This approach is reflected in the East Suffolk Housing Strategy (Document G3, page 24) which refers to working in partnership with other Suffolk authorities to review provision of specialist accommodation. In this context, it is appropriate that the Local Plan provides a supportive and encouraging policy framework but is not prescriptive on how and where the needs are met.
12. The Final Draft Local Plan has been prepared with a view to positively addressing the issues presented by the increasing elderly population in Suffolk Coastal by increasing the mix of housing (page 31 of Final Draft Local Plan, Document A1). There are a number of ways in which the policies of the Plan aim to increase the mix of housing available and support the provision of specialist housing for older people. Specific policies which take these aims forward include:

- Policy SCLP5.8 Housing Mix sets out support for sheltered and extra care housing for older people, reflecting the supporting text which explains the needs for specialist accommodation as identified in the SHMA (Document D1). This therefore sets out specifically that provision for specialist dwellings would be supported on sites which come forward for specialist housing;

- Policy SCLP5.11 Affordable Housing on Exception Sites provides for affordable housing to come forward on exception sites, reflecting paragraph 77 of the National Planning Policy Framework. This policy would provide support in principle to affordable specialist accommodation for older people on exception sites;

- The Plan identifies a specific role in relation to the Garden Neighbourhoods due to their strategic scale - Policy SCLP12.3 North Felixstowe Garden Neighbourhood contains a requirement for retirement dwellings comprising care home / extra care / sheltered dwellings (criterion q) and Policy SCLP12.29 South Saxmundham Garden Neighbourhood contains a requirement for housing to meet the needs of older people, younger and vulnerable people (criterion s);

- A number of site allocation policies include provision for a mix of dwellings including to meet the needs of older people. This requirement does not specify the type of dwellings, however the provision of specialist housing would in principle fall within the scope of this requirement.

13. The above specific policies, which would support provision of specialist housing, should be viewed alongside the various parts of the Plan which aim to increase the choice of housing available and to create environments which will help to support people throughout their lifetime. In addition to the policies referred to above, Policy SCLP5.8 also includes a requirement on proposals of 10 units or more to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations, which is supported by the Planning Practice Guidance on Housing for Older and Disabled People (Paragraphs 008 and 009). Policy SCLP11.1 Design Quality expects that proposals would be designed following the principles of dementia friendly design.
Plan options

14. The paragraphs below consider options for the Local Plan in responding to the guidance contained in the new PPG.

15. Within this context set out above it is not appropriate for the Local Plan to specifically look to allocate sites for the provision of housing to meet specialist housing needs. Paragraph 11 of the NPPF requires plans to positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. On this basis, and considering that demands and needs for specialist accommodation are identified as being dependent on changes in demand and expectations, it is considered appropriate that the Plan does not restrict the use of any particular sites that have been identified as appropriate for allocation (considering the strategy of the Local Plan and the process of site selection as set out in Document D36) only to the provision of specialist accommodation. The allocation of additional sites to meet the need identified would undermine the process of site selection that has been undertaken and would require consideration to be given to the potential for any potentially suitable site to meet specialist needs (not only those currently being promoted as such through the Examination process). Due to the nature of need, sites which would accommodate specialist housing would be larger sites and this approach would also therefore potentially compromise the Council’s approach to the allocation of smaller sites to meet the requirements of paragraph 68a of the NPPF.

16. It is not considered appropriate for the Plan to enable market specialist housing to come forward on exception sites. Policy SCLP5.11 would, as written, support the development of affordable specialist accommodation on exception sites in principle. The disaggregation of the need in the attached note shows that there is a need for affordable specialist housing. Providing any flexibility in the policy to support market specialist accommodation is likely to compromise any potential for the policy to deliver affordable accommodation. Further, this would not be consistent with paragraph 77 of the NPPF which is clear that rural exception sites should be supported where they would provide affordable housing to meet identified local needs.

17. Whilst the Plan currently contains a suite of policies which set out a positive framework to support the development of housing to meet needs for specialist accommodation, the Council considers that an approach by which the policies are further strengthened would be an appropriate way in which the emphasis placed on specialist housing for older people in the new PPG could be responded to, and which retains the flexibility to react to changing circumstances over the Plan period. This could include the inclusion of a requirement for specific consideration to be given to whether specialist accommodation could be provided to meet an identified need on sites of a certain scale.

Conclusion

18. This note has been provided to update the assessment contained in the Strategic Housing Market Assessment Part 2 (Document D15) to reflect the guidance contained in the Planning Practice Guidance on Housing for Older and Disabled People which was published in June 2019.
19. The note sets out options on how the Suffolk Coastal Local Plan could take forward the guidance contained in the Planning Practice Guidance, and sets out that the Council would consider modifications to further strengthen the support and encouragement given to the provision of housing to meet specialist needs for older people, within the context of the existing positive approach provided by the Plan to increasing the mix of housing and providing for the needs of older people.

20. The note is presented in advance of discussions to be held during Hearing Day 8 on Housing policies.
Appendix 1

Needs for older person accommodation (by size and tenure)

The table below sets out the type of housing required for older person only households in Suffolk Coastal in 2036. This is derived from the LTBHM¹ outputs (for general housing²) and the specialist accommodation modelling (for other housing modes³). The specialist housing definitions used in the original report corresponded with what was published by the Suffolk County Council outputs which were used to inform this projection. The work published by Suffolk County Council⁴ was derived from the Strategic Housing for Older People (SHOP) tool developed by the Housing Learning and Improvement Network⁵ and these were categories used in this model at the time. The footnotes illustrate how these categories correspond with the types of specialist housing for older people that are listed in the new PPG. It is important to note that the figures presented in the table are gross figures and that any accommodation of this type that is currently available should be subtracted from them to produce a net requirement over the plan period.

| Type of accommodation required for older person only households in Suffolk Coastal in 2036 (gross) |
|---------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
|                                 | Market          | Affordable       |                |                |                |
| Size of home                   | General housing⁶ | Sheltered housing⁷ | Enhanced sheltered/ Extra care housing⁸ | General housing | Sheltered housing | Enhanced sheltered/ Extra care housing |
| 1 bedroom                      | 3,163           | 1,269           | 253           | 1,953          | 749           | 216           |
| 2 bedrooms                     | 8,177           | 244             | 17            | 2,453          | 65           | 4             |
| 3 bedrooms                     | 15,690          | -               | -             | 501            | -             | -             |
| 4+ bedrooms                    | 3,817           | -               | -             | 0              | -             | -             |
| Total in households            | 30,847          | 1,493           | 270           | 4,907          | 814           | 220           |
| Residential care⁹              | 1,618           | -               | -             | -              | -             | -             |

¹ Long Term Balancing Housing Markets model
² As illustrated in table 6.1 of the SHMA report.
³ As illustrated in table 6.2 of the SHMA report.
⁴ See https://ipc.brookes.ac.uk/market-position-statements/Suffolk_MPS_2015.pdf
⁵ http://www.housinglin.org.uk/
⁶ This includes ‘age-restricted general market housing’ as defined in the PPG (the type of housing is generally for people aged 55 and over and the active elderly) as well as general housing available to all people. This analysis is focused only on those where all household members are aged 65 or over, there is likely to be additional requirement for age-restricted general market housing from those aged between 55 and 64.
⁷ A collection of self-contained units of accommodation (usual bedsits within a communal block), which have on-site warden support (usually daytime only with on call service at night) and communal social areas and activities. This is very similar to the housing type ‘Retirement living or sheltered housing’ as defined in the PPG.
⁸ Enhanced sheltered is similar to sheltered accommodation, but with enhanced provision for personal care of frailer older people. On-site support is usually provided on a 24 hour rather than day-time only basis. Extra care housing is an enhanced sheltered housing setting with a focus on the extra care needs of people often focused on addressing the needs of people with dementia. These two housing types are similar to the ‘Extra care housing or housing-with-care’ definition in the PPG.
⁹ Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes. This is the same as the definition in the PPG.
Appendix 2

Existing Stock and Net Needs (Market and Affordable)

The table below sets out the current stock of specialist older persons accommodation available in Suffolk Coastal in 2016. These figures were obtained from the work published by Suffolk County Council which was derived from the Strategic Housing for Older People (SHOP) tool developed by the Housing Learning and Improvement Network.

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<thead>
<tr>
<th>Type of specialist accommodation present in Suffolk Coastal in 2016</th>
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<tr>
<td>Residential care</td>
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<td>Sheltered housing</td>
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<tr>
<td>Enhanced sheltered/ Extra care housing</td>
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The table below shows the net requirement for additional specialist accommodation in Suffolk Coastal over the plan period, calculated by deducting the current stock from the future requirement. It is therefore possible to calculate a net need for affordable and market needs as follows:

<table>
<thead>
<tr>
<th>Net need for specialist accommodation in Suffolk Coastal (2016 – 2036)</th>
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<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>Residential care</td>
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<tr>
<td>Sheltered housing</td>
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<td>Enhanced sheltered/ Extra care housing</td>
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</tbody>
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10 As illustrated in table 6.2 of the SHMA report.
11 See https://ipc.brookes.ac.uk/market-position-statements/Suffolk_MPS_2015.pdf
12 http://www.housinglin.org.uk/