



21st November 2017

Planning Policy Team
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

Dear Sir/Madam,

MCCARTHY & STONE RETIREMENT LIFESTYLES LTD RESPONSE TO CONSULTATION ON THE LOCAL PLAN 2031 PART 2 DETAILED POLICIES AND ADDITIONAL SITES

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the Local Plan Proposed Submission consultation, insofar as it affects or relates to housing for the elderly.

The National Planning Policy Framework stipulates that the planning system should be ‘*supporting strong, vibrant and healthy communities*’ and highlights the need to ‘*deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community... such as... older people*’ (emphasis added).

The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled “**How should the needs for all types of housing be addressed?**” (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for “**Housing for older people**”. This stipulates that “*the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important*” (My emphasis).



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The 'Housing White Paper: Fixing our broken housing market' clearly signals that greater consideration must be given to meeting the needs of older persons' in Local Plans stipulating that 'Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services⁸². It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people.' (Para 4.42) (My emphasis).

Paragraph 3.17 states that the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 demonstrates that there is a need for housing to be delivered in the Vale of White Horse District for people with specific requirements, such as the older population, and people with disabilities. **Core Strategy Policy 46** identifies the importance of meeting the needs of Vale of White Horse's vulnerable and older people.

In line with the rest of the country, this demonstrates an acceptance that the demographic profile of the Authority is projected to age. The largest proportional increases in the older population are expected to be of the 'frail' elderly, those aged 85 and over, who are more likely to require specialist care and accommodation provided by Extra Care accommodation. It is therefore clear that the provision of adequate support and accommodation for the increasingly ageing demographic profile of the District is a significant challenge.

We note that there are no allocations for the delivery of older persons' accommodation in the Plan, nor is there consideration of the suitability of the sites detailed for such developments.

Unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population in Vale of White Horse, which will have a knock-on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the areas housing needs.

We would advocate that the Council take a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within the consultation document. There is an opportunity to facilitate the delivery of Specialist accommodation by identifying locations for the delivery of Older Persons Accommodation within existing or new Housing Site Allocations.

We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation.



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When selecting sites for elderly persons' accommodation careful consideration is given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. As such, suitable sites for specialist accommodation for the elderly are difficult to find and tend to be located within, or adjacent to town or local centres. It is therefore highly unlikely that the majority of development sites will be suitable for specialist accommodation for the elderly, particularly on urban extension sites where access to goods and services may be limited. Having said that, when new local centres are being created these may also provide an appropriate location for retirement housing developments.

Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents in order to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.

We would like to highlight the advice provide in the *Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit*. This toolkit was developed by a consortium of private and public organisations with an interest in housing for the elderly and encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. A copy of this document has been appended for your convenience. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.

The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."

Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older persons accommodation in Vale of White Horse there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate policy within the document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security. In effect there should be more of a positive policy supporting older people's accommodation in the same way that affordable housing is given a high priority.

I trust that the above comments will be considered in the evolution of any emerging consultation



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document and that we will continue to be invited to comment as the document progresses.

Yours faithfully

Carla Fulgoni
Senior Planning Associate
Tel: 01202 508 206
Email: Carla.fulgoni@theplanningbureau.ltd.uk