

South Staffs Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Churchill House, Parkside
Christchurch Road, Ringwood
Hampshire BH24 3SG
Telephone 01425 462372
Fax 01425 462101

Dear Sirs,

**CHURCHILL RETIREMENT LIVING & McCARTHY STONE
RESPONSE TO CONSULTATION ON THE SOUTH STAFFORDSHIRE COUNCIL
DRAFT LOCAL PLAN REVIEW (REGULATION 18) CONSULTATION**

McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.

We respond to the questions of the consultation insofar as they impact the delivery of specialist accommodation for older persons. It is our view that the plan has not been positively prepared to meet the needs of the area's older population.

Policy HC3: Affordable Housing

Policy HC3: Affordable Housing sets a flat affordable housing requirement of 30% across the district.

The wording of *Policy HC3* makes it clear that off-site and non-policy compliant level of affordable housing will only be allowed in 'exceptional circumstances.'

It is therefore clear that the Local Authority is aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF. The evidence underpinning the Council's affordable housing requirement should therefore be robust and we would respectfully remind the Council that the PPG states that "*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan*" (Paragraph: 002 Reference ID: 10-002-20190509).

Disappointingly the Regulation 18 consultation is not supported by a Local Plan Viability Assessment (LPVA) publicly available. The *Local Development Framework: Affordable Housing Viability Study* (2011) by Adams Integra is a decade old and is assumed not to form part of the evidence base for the emerging Local Plan review on that basis.

In the first instance it is surprising that a Planning Authority would choose to publish a Local Plan without having ascertained that the policies within it are deliverable. Secondly by limiting scrutiny of the Local Plan Viability Assessment to the Regulation 19 consultation the Council is reducing the opportunities for comment on this, crucial, element of the evidence base. It is a less robust piece of evidence as a consequence.

The PPG makes it clear that Local Plan process is a collaborative process stating that '*It is the responsibility of plan makers in collaboration with the local community,*

developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers (Paragraph: 002 Reference ID: 10-002-20190509). By limiting the opportunities for comment of the Local Plan Viability Assessment we are of the view that the Council has deviated substantially from national guidance and this could subsequently undermine the soundness of the Plan.

It is our view that the Council should reconsult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.

We would also like to respectfully remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the LPVA. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. *"A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.*

RECOMMENDATION:

That interested parties are given the opportunity to comment on the Local Plan Viability Study prior to the Regulation 19 Local Plan being published for consultation.

That the viability of older persons' housing typologies is assessed as part of the Local Plan Viability Study.

Policy HC5: Specialist Housing Schemes

McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.

Paragraph 1 of the PPG Housing for Older and Disabled people states:

"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".

Paragraph: 001 Reference ID: 63-001-20190626

The age profile of the population can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 27,238 persons aged 65 and over in 2018, accounting for 24% of the total population of South Staffordshire.

This age range is projected to increase by 8,934 individuals, or 33%, to 36,172 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 30% of the total population of the Borough by 2043.

In 2018 there were 7,095 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 5,628 individuals, or 79%, to 12,723 persons between 2018 and 2043.

Meeting the diverse housing needs of older people over the Local Plan period is substantial undertaking unless action is urgently taken the Council will struggle to address this need. The inclusion of a positively worded policy, strongly supporting the delivery of specialist older persons' housing will assist in this regard.

RECOMMENDATION

We commend the Council's intention to strongly support the delivery of specialist older persons' housing through a dedicated policy in the Local Plan.

In drafting the dedicated policy for specialist older persons' housing, we would recommend wording that both acknowledges the need and stipulates the circumstance in which the Local Authority will support the delivery of housing suitable to be adapted to the elderly. As an example we would refer the Council to *Policy ST31: Specialist Housing* of the emerging [Bassetlaw Local Plan 2020-2037](#) which we consider to be an exemplar policy.

Policy HC13: Health and Wellbeing

We welcome the Council's commitment to the health and wellbeing of its residents. As detailed in our representation to *Policy HC5: Specialist Housing Schemes*, the demographic profile of the District is ageing with the number of people aged 65 and over expected to increase to account for 30% of the total population by 2043.

An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently.

It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example:

Falls - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over.

Cold Homes - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression.

Social Isolation - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes.

Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and

companionship. The recently published *Healthier and Happier Report* by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.

The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective.

RECOMMENDATIONS

We recommend that the role of specialist older persons' housing in improving the health and wellbeing of the district's elderly residents is acknowledged in the wording of this policy.

As a suggestion we would recommend an additional sub-clause to the emerging policy which reads as follows:

Ensure that the needs of the District's ageing population are addressed, and that older people have increased access to support, care, companionship, and appropriate accommodation.

Policy HC17: Open Space

Policy HC17 stipulates a requirement for sites of 33 dwellings or above to provide 60m² of multi-functional, centrally located open space per dwelling.

It is problematic when Local Planning Authorities seek to impose generic design standards on specialist older persons' accommodation as they rarely consider the specific needs of the intended residents and disregard the expertise of specialist providers in providing these types of development.

Typical purchasers are 78-year-old widows who typically move into retirement living accommodation prompted by an 'event' such as the death of a partner, or a serious trip or fall. Residents tend to be frailer, or mindful of increasing frailty. Residents therefore tend to use the communal garden space in a passive way and mainly involves sitting out.

Housing designed for a range of potential occupiers, in particular families, require a greater amount outdoor space to accommodate space for children's play, space for light exercise and socialising. This is not however the case for retirement living apartments.

Specialist older persons' accommodation also incorporates internal communal facilities for the benefits of residents, such as a communal lounge or coffee bar. This is a highly valued space, which helps promote social interaction and facilitate a sense of community. Residents value this amenity space far more than large, grassed areas and is usable all year round.

We are therefore of the view that a requirement for 60m² per dwelling substantially exceeds the needs of residents of older persons' housing. Appeals by developers of specialist older persons' housing contesting refusals by Councils on the grounds of non-compliance with amenity space standards have consistently been determined in favour of the appellants.

RECOMMENDATIONS

Specialist housing, particularly older persons' housing, should be exempt from the requirement to provide 60m² per dwelling with the level of amenity space determined on a case-by-case basis.

Given the importance placed on achieving efficient use of land, as set out in para 122 of the NPPF, the level of amenity of all housing developments near town or district centres should be determined on a case-by-base basis. This will allow for the most efficient use of land in the most sustainable locations.

Policy NB6: Energy and water efficiency, energy and heat hierarchies and renewable energy in new development

The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions by 2050 is commendable.

Government consulted on interim changes in both Part F and Part L of the Building Standards through the second consultation on *The Future Buildings Standards* and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. At present it is expected that new homes built from 2022 will need to produce 31% less carbon emission than the current Building Regulations.

This requirements for carbon emission reductions in emerging *Policy NB6* are therefore aligned with those of Government. While this is welcomed, and commendable, we would respectfully query why a bespoke energy efficiency target is required.

RECOMMENDATION

We recommend that the requirement for a reduction in carbon emissions is aligned with the emerging targets of Government being delivered through the Building Regulations (Part L & F).

Thank you for the opportunity for comment.

Yours faithfully

Ziyad

Ziyad Thomas
BSc (Hons), MSc, MRTPI
Associate Director