

# The Planning Bureau Limited

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**Tunbridge Wells Borough Local Plan**

**Examination in Public**

**Stage 3 hearing statement**

**The Planning Bureau on behalf of**

**McCarthy & Stone Retirement Lifestyles Ltd.**

**May 2024**

**Matter 8**

**Issue 3 – Housing for Older People and People with Disabilities**

**Q1. Considering the conclusions reached in paragraphs 89-92 of the Inspector's Initial Findings, how can the Plan be modified to rectify the soundness issues identified?**

It is for the Council to put forward amendments to the plan that removes reference to the definition of C2/C3 housing as discussed in para 90 of the Inspectors Initial Finding. We agree that this should be determined on a case-by-case basis as discussed in Paragraph: 014 Reference ID: 63-014-20190626 of PPG on housing for older and disabled people. It is also for the Council to determine their housing need for extra care housing. However, the Council should consider whether discrepancies between the Kent County Council model and SHOP is associated with the Kent model only including an affordable need and the SHOP model including both affordable and market need for extra care housing. Both forms of tenures of course need to be considered, and particularly so with the increased emphasis given by revised Para 63 to the NPPF, emphasising the need for proper assessment of older persons housing .We will comment upon the Council's revised wording once published.

In our representation to the submission local plan (rep number 2045) we noted that the focus of the policy area H6 and its supporting paragraphs was on extra-care housing and we recommended that the plan should '*consider the future demand for other forms of specialist older persons' housing, specifically sheltered housing*' and felt that the policy is undermined by the lack of consideration given to older persons' housing typologies as defined within the PPG on Housing for older and disabled people paragraph: 010 Reference ID: 63-010-20190626.

For clarification, the Council appear to be promoting, through policy H6, to meet the housing needs of older people predominantly through promoting housing that allows people to live as independently as possible. It is not clear what this represents and could be perceived as adapting their existing family sized homes (which is of course not something that can be delivered by the planning system) or conventional housing that is designed to be adaptable. Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that: "*the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support*", given the need for specialist older persons housing, McCarthy Stone is very concerned with the Council's approach and we are firmly of the view that ensuring that residents have the ability to stay in their existing home for longer or move into new adapted accommodation is not by itself, an appropriate manner of meeting the housing needs of older people with neither of those options having the many benefits that specialised housing for older people can bring, not least by directly addressing loneliness and social isolation.

Given the emphasis of the NPPF at para 63 (as now revised) 2 and of Paragraph: 001 Reference ID: 63-001-20190626 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*', we feel that in order for the plan to be consistent with national policy and to be positively prepared in line with NPPF para 16 b, the policy should also be amended to be more supportive of specialist housing for older people.

As such Policy H6 should be more supportive of the older persons housing typologies and the following paragraphs added to the beginning of the policy:

***The Council will support the provision of specialist housing for older people across all tenures in sustainable locations close to facilities. The Council aims to ensure that older people are able to***

**secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care.**

**Q2. What implications will the Council's suggested changes to the Plan have on the provision of housing to meet the needs of older people and people with disabilities?**

For Council, however if the policy is not widened to be more supportive of specialist housing for older people in line with the definitions within the PPG on housing for older and disabled people, such housing, for which there is a "critical" need may not be delivered.

**Q3. In the event that needs will not be met, how can the Plan be modified in order to make it sound?**

Housing for older people, being specialist in nature, is often delivered on brownfield sites separate to housing allocations or other development sites and tend to be high-density flatted developments on small or medium sized sites of around 0.5 hectares located near town centres that have a minimum amount of around 35 to 40 units. As such in the event that needs are not met via the proposed allocations, making amendments to Policy H6 to be more supportive of specialist housing for older people generally and unequivocally supportive of such developments on windfall sites rather than relying on mainstream housing would enable such brownfield schemes to come forward more easily.

In addition, our representation to Policy H3 (affordable housing) rep 2044 and supporting document ref no 139, provided additional evidence with respect to the viability of sheltered and extra-care housing and concluded that, contrary to the Council's viability evidence, Viability Assessment Stage 1, Dixon Searle Partnership, 2019 (document no 3.54) the older persons typologies of extra-care and sheltered housing should be exempt from affordable housing provision and CIL on previously developed sites and as such we recommended an additional paragraph to Policy H3 which read as follows:

**'Specialist older persons' housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution.'**

This would ensure that proposals for specialist housing for older people can go ahead on brownfield sites without protracted delay or discussions over viability and for the plan to be consistent with national policy, specifically paragraphs Paragraph: 002 Reference ID: 10-002-20190509 and Paragraph 004 Reference ID: 10-004-20190509.