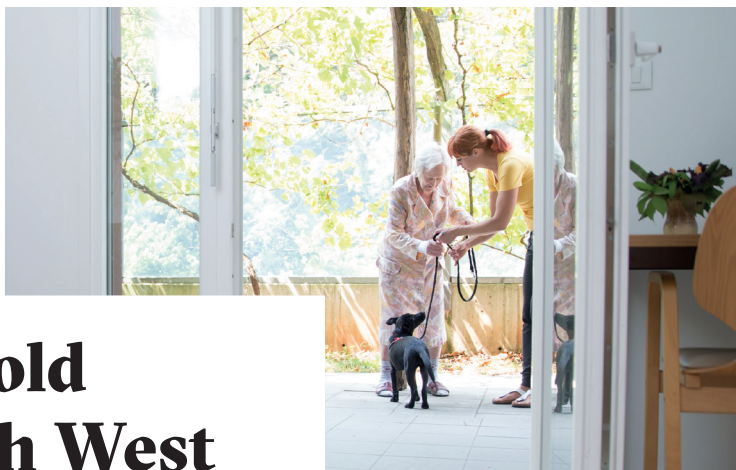


# Insight focus

APRIL 2019

## Solutions to an age old problem in the South West



The population of South West England is ageing rapidly. Consequently, there is an urgent need to provide more specialist accommodation for older people.

This Insight Focus follows on from Lichfields' national research, 'Solutions to an age old problem', in exploring the planning issues and the policy context for older people's housing in the South West.

### The ageing population

The number of people aged 65 and over in the South West is expected to increase by 50.4% between 2016 and 2041, equivalent to 600,300 people. This includes an additional 184,800 people aged 85 and over (an increase of 109.6%).<sup>1</sup> By comparison, the overall population is anticipated to increase by 16.4% during this period.

All of the 36 local authorities in the region<sup>2</sup> are expected to experience significant growth in the number of people aged 65 and over during the 25-year period, ranging from 34.5% in Bristol to 82.2% in Swindon.

The highest absolute increases are expected in Wiltshire (66,000) and Cornwall (62,900).

### Need for specialist housing

Most older people live in general housing. However, many people will move to specialist housing at some point in their lives. Key factors affecting housing choices include the individual's health, financial position, the desire to be closer to family, the suitability of their current accommodation and the extent to which it can be adapted to meet specific needs.

Based on the anticipated population growth in the South West region, approximately 81,600 additional specialist units (not including registered care home places) will be required in the South West between 2016 and 2041.<sup>3</sup>

### HEADLINE FIGURES

**600.3k** additional people in the South West aged 65+ in 2041, compared to 2016

**81.6k** additional specialist units needed in the South West by 2041

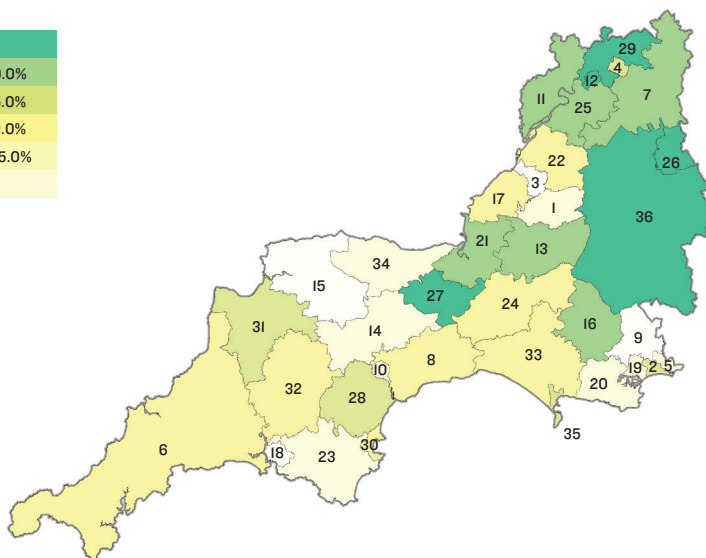
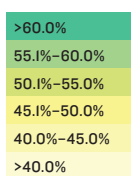
**64%** of Local Plans in the South West contain policies to support older people's housing

**14%** of Local Plans in the South West include a requirement for older people's housing

**17%** of Local Plans in the South West allocate sites specifically for older people's housing

Figure 1: Projected growth in population aged 65+ (2016-2041) (%)

Projected growth in population aged 65+ (2016-2041) (%)



- Bath and North East Somerset
- Bournemouth
- Bristol
- Cheltenham
- Christchurch
- Cornwall
- Cotswold
- East Devon
- East Dorset
- Exeter
- Forest of Dean
- Gloucester
- Mendip
- Mid Devon
- North Devon
- North Dorset
- North Somerset
- Plymouth
- Poole
- Purbeck
- Sedgemoor
- South Gloucestershire
- South Hams
- South Somerset
- Stroud
- Swindon
- Taunton Deane
- Teignbridge
- Tewkesbury
- Torbay
- Torrige
- West Devon
- West Dorset
- West Somerset
- Weymouth and Portland
- Wiltshire

<sup>1</sup> ONS 2016-based sub-national population projections

<sup>2</sup> Excluding the Isles of Scilly

<sup>3</sup> Assessed using the national standard ratio of 170 units per 1,000 people aged over 75 identified by the Housing Learning and Improvement Network (HLIN).

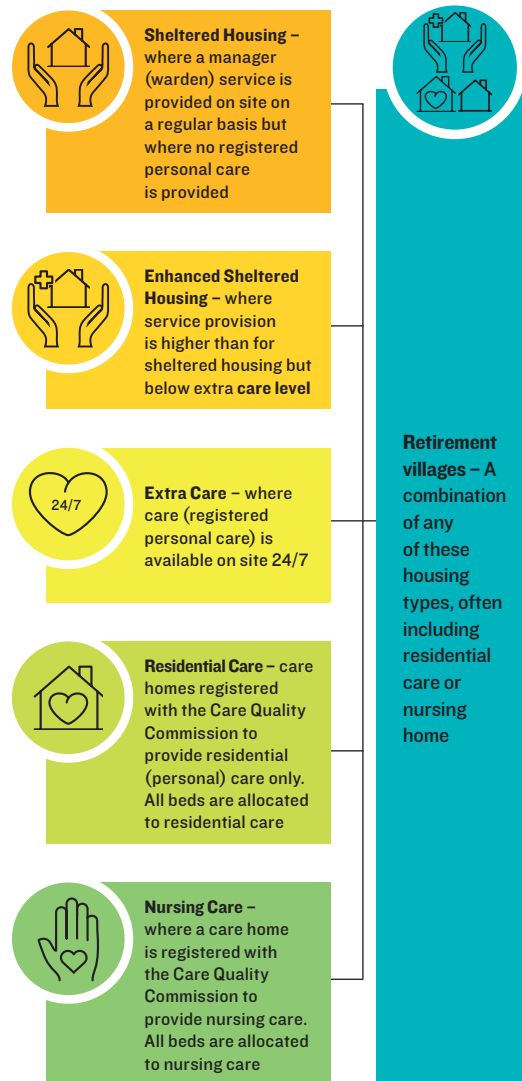
Source ONS 2016-based sub-national population projections

LICHFIELDS

## Types of housing for older people

A wide range of different specialist housing products are now available for older people. The most commonly applied categories are summarised in Figure 2:

Figure 2: Key types of elderly accommodation for older people



Source: Elderly Accommodation Council National Housing Database (2014)

Additional facilities, such as shops, restaurants and recreational facilities are often provided in the retirement developments above that offer self-contained units.

In addition to these types of accommodation, whilst not traditionally classed as older people's housing, there are also park homes (mobile homes): pre-fabricated single-storey homes designed for permanent residence and aimed at older people.

## National planning policy context

### National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (February 2019) states that planning policies should reflect the size, type and tenure of housing needed by different groups, including older people.<sup>4</sup>

The NPPF defines older people as: *“People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”* (Lichfields emphasis).

### Planning Practice Guidance

The Planning Practice Guidance (PPG) states that the need to provide housing for older people is “critical”.<sup>5</sup> It emphasises that strategic policy makers should consider both how to support older people to live independently and safely in their own homes and how to support the provision of specialist accommodation, e.g. sheltered, extra care and registered care.

### Housing Delivery Test

The revised NPPF introduced the new Housing Delivery Test (HDT), an annual measurement of housing delivery, against which local planning authorities are judged, and sanctions applied, in order to boost supply. The first HDT results were published in February 2019. The HDT 2018 Measurement Technical Note (2019) states that the delivery of bedspaces in communal establishments, e.g. residential care homes, will be counted towards this test on a pro rata basis.<sup>6</sup> This means that delivery of all types of specialist accommodation for older people will contribute towards local authorities' housing supply and can help them meet the HDT.

### Housing for Older People Inquiry

In its response to the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People (2017-19),<sup>7</sup> the Government emphasised its commitment to *“do more to ensure that more homes suitable for older people are being built”*.<sup>8</sup> It also recognised the need to provide a better choice of accommodation for older people to *“enable them to live independently for longer, improve their quality of life and free up more family homes for other buyers”*.

<sup>4</sup> NPPF, paragraph 61

<sup>5</sup> Reference ID: 2a-017-20190220

<sup>6</sup> The HDT is based on the number of net homes delivered. Bedrooms in communal establishments are included based on a ratio of the average number of adults per household in England from the most recent Census (1.8 in the 2011 Census)

<sup>7</sup> Housing, Communities and Local Government Committee, Housing for Older People: Second Report of Session 2017-19 (9 February 2019)

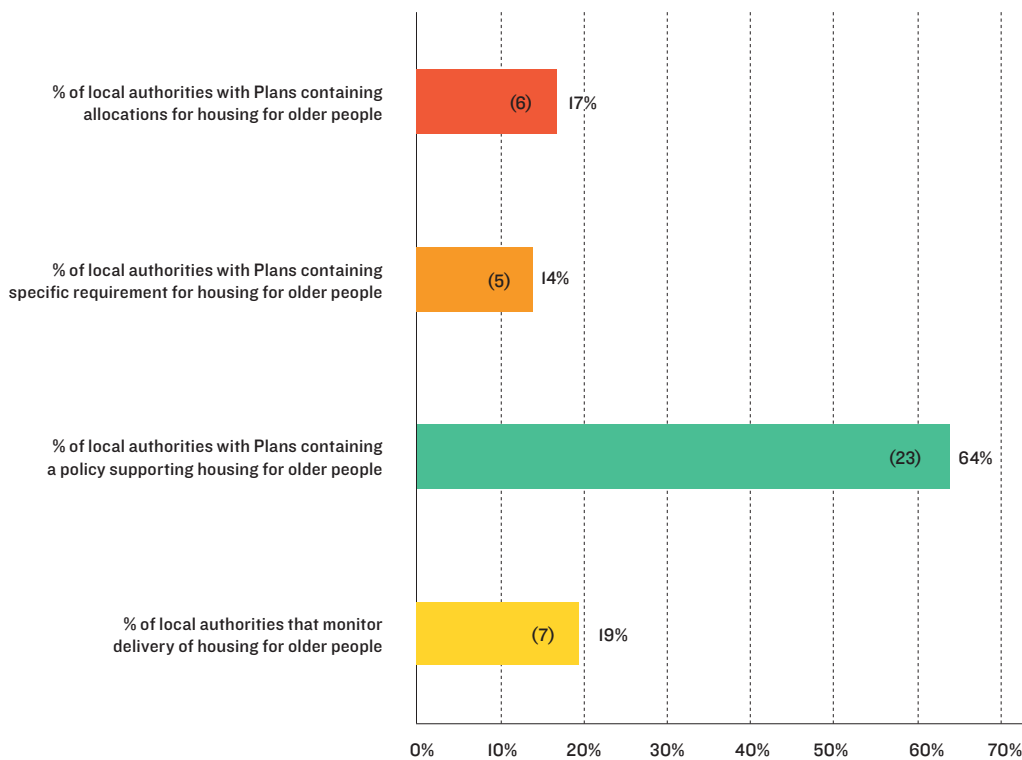
<sup>8</sup> Government Response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People (September 2018)

Lichfields has undertaken a review of the treatment of specialist housing for older people in adopted Local Plans in the South West.<sup>9</sup> The results of this analysis are summarised in Figure 3.

This assessment demonstrates that, whilst few formal measures are currently in place to ensure that housing for older people is delivered, there are policy “hooks” in many adopted Plans in the South West to support planning applications for older people’s housing. However, if we are to see a step change in the delivery of accommodation for older people, there is a need for stronger local policy to support this type of housing. Lichfields’ national policy recommendations are set out in our Insight, ‘Solutions to an age old problem’.

Appendix 1 summarises the Local Plan status in each local authority area in the South West and identifies the policy measures currently in place to meet the need for housing for older people. It also highlights areas where there may be opportunities to promote sites for older people’s housing as part of the Plan-making process. However, any of these plans may need to be revised to reflect national policy changes in the revised NPPF.<sup>10</sup> Hence, there will be opportunities in many areas for the development industry to influence the formulation of new policy to support older people’s housing.

Figure 3: Analysis of local authorities with adopted Plans in the South West



Source: Lichfields analysis

<sup>9</sup> This analysis considers the 31 adopted Local Plans in the South West (including Joint Plans), covering 36 local authorities

<sup>10</sup> The revised NPPF states at paragraph 212 that plans may need to be revised to reflect national policy changes. However, it sets out at paragraph 213 that existing policies should not be considered out-of-date simply because they were adopted prior to the publication of revised NPPF

# Appeal decisions: key planning considerations

Lichfields has analysed 23 recent appeal decisions associated with older people's housing, including 13 in the South West region.<sup>11</sup>

## Use Class: C2 or C3?

Traditional residential care homes, where meals and other facilities are provided on a communal basis, will fall within Use Class C2. However, for self-contained housing types such as extra care/assisted living, where communal facilities and personal care are also provided, the distinction is less clear. This was a point of contention in several of the appeals.

The assigned use class has financial implications in regard to policy requirements and obligations, such as CIL charges and affordable housing requirements. C3 uses typically attract planning obligations, whilst those in C2 do not.

The Town and Country (Use Classes) Order 1987 definition of Use Class C2 (Residential Institutions) includes:

1. "Use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses))"; and,
2. "Use as a hospital or nursing home".

The definition of Use Class C3 (Dwellinghouses) includes the qualifying characteristic that residents form a single household, whether or not care is provided. Article 2 of the Town and Country Planning (Use Classes) Order 1987 defines "care" as personal care for people in need of such care by reason of, inter alia, old age. Personal care was treated in one appeal as including a broad range of assistance, for example aiding in use of internet, accompanying residents to on-site activities, as well as more traditional means of care.<sup>12</sup> However, most appeals applied a narrower definition of care, e.g. personal hygiene, dressing, feeding.

Table 1 summarises the key factors that were considered by Inspectors to give weight to the classification of schemes within Use Class C2.

Table 1: Characteristics of Use Class C2

One or more occupiers of each unit aged 55+ and assessed as being in need of personal care
Residents receive at least 2 hours of personal care per week as a condition of occupancy
Care manager resident onsite and/or carers are able to stay onsite
Provision of services and communal facilities that are "inextricably linked to an expected way of life"

Source: Lichfields analysis of appeal decisions relating to older people's accommodation

## Other material considerations

Our analysis has identified the following additional key planning considerations that were specific to accommodation for older people:

Table 2: Key planning considerations for older people's accommodation

Current supply of accommodation of the type proposed (over or under-provision)
The potential to free up general housing
Access to local facilities
A recognition that extra care schemes needed to be of a sufficient size to support shared facilities <sup>13</sup>

Source: Lichfields analysis of appeal decisions relating to older people's accommodation

In many cases general planning principles (e.g. the sustainability of the location) and site-specific factors (e.g. impact on highway safety) were considered to outweigh the benefits of providing accommodation for older people, and the need for specialist housing was not a determinative factor. However, in one case in West Malling<sup>14</sup> an Inspector found that the benefits of a proposal located in the Green Belt constituted "very special circumstances" that justified its release from the Green Belt. These benefits included its potential contribution towards addressing unmet need for specialist housing, health and wellbeing benefits, and its ability to free up general housing. In this instance, the site had already been identified for release from the Green Belt for residential use in the Reg. 19 Draft Local Plan but since it had not passed the Plan examination limited weight was given to this emerging policy change.

<sup>11</sup> The majority of these schemes (65%) fell in the range of 30 to 80 bedspaces or self-contained units

<sup>12</sup> APP/M2270/W/16/316379 (14 June 2017)

<sup>13</sup> APP/H2265/W/18/3202040 (19 December 2018)

<sup>14</sup> APP/H2265/W/18/3202040 (19 December 2018)

Whilst there are policy “hooks” in many adopted Plans in the South West to support proposals for older people's housing, far more needs to be done to plan positively for this rapidly expanding section of the population. The preparation of new and revised Plans in the South West will offer valuable opportunities for the development industry to engage with policy makers and champion the need for a step change in the delivery of homes for older people.

There is no evidence to suggest that the benefits of providing older people's housing will overcome objections that would render a site unsuitable for general residential development.

However, the West Malling appeal decision demonstrates that the need for older people's housing can add significant weight to the planning balance, including in the case of Green Belt release.

It is therefore important that development proposals for older people's accommodation are accompanied by robust evidence to demonstrate the need for and the advantages of specialist accommodation for older people.

#### Disclaimer

This publication has been written in general terms and cannot be relied on to cover specific situations. We recommend that you obtain professional advice before acting or refraining from acting on any of the contents of this publication. Lichfields accepts no duty of care or liability for any loss occasioned to any person acting or refraining from acting as a result of any material in this publication. Lichfields is the trading name of Nathaniel Lichfield & Partners Limited. Registered in England, no.2778116. Registered office: 14 Regent's Wharf, All Saints Street, London N1 9RL © Nathaniel Lichfield & Partners Ltd 2019. All rights reserved.

## Contact Us

### Birmingham

Jon Kirby  
jon.kirby@lichfields.uk  
0121 713 1530

### Bristol

Andrew Cockett  
andrew.cockett@lichfields.uk  
0117 403 1980

### Cardiff

Gareth Williams  
gareth.williams@lichfields.uk  
029 2043 5880

### Edinburgh

Nicola Woodward  
nicola.woodward@lichfields.uk  
0131 285 0670

### Leeds

Justin Gartland  
justin.gartland@lichfields.uk  
0113 397 1397

### London

Neil Goldsmith  
neil.goldsmith@lichfields.uk  
020 7837 4477

### Manchester

Simon Pemberton  
simon.pemberton@lichfields.uk  
0161 837 6130

### Newcastle

Jonathan Wallace  
jonathan.wallace@lichfields.uk  
0191 261 5685

### Thames Valley

Daniel Lampard  
daniel.lampard@lichfields.uk  
0118 334 1920

## Appendix 1: Local Plan status

Table 3: Local Plan\* status (February 2019)

LPA	Projected growth in people aged 65+ (2016-2041)	Status of adopted Local Plan (year adopted)	Status of emerging Local Plan / Local Plan Review	Monitoring	Supportive policy	Requirement for housing for older people	Allocations
Bath & North East Somerset	40.5%	●	■	No	No	No	No
Bournemouth	53.1%	●	■	No	No	No	No
Bristol	34.5%	●	■	Yes	No	No	Yes
Cheltenham	53.4%	●	■	No	Yes	No	No
Christchurch	40.6%	●	■	No	Yes	No	No
Cornwall	46.7%	●	□	Yes	Yes	Yes	No
Cotswold	55.8%	●	□	Yes	Yes	Yes	No
East Devon	47.5%	●	□	No	Yes	Yes	No
East Dorset	38.3%	●	■	No	Yes	No	No
Exeter City	43.6%	●	■	No	Yes	No	No
Forest of Dean	58.9%	●	□	No	Yes	No	No
Gloucester City	69.7%	●	■	No	Yes	No	No
Mendip	58.3%	●	■	No	Yes	No	No
Mid Devon	44.6%	●	■	No	No	No	No
North Devon	36.6%	●	□	No	No	No	Yes
North Dorset	55.9%	●	■	No	Yes	No	No
North Somerset	49.9%	●	■	No	No	No	No
Plymouth	38.3%	●	■	No	Yes	No	No
Poole	42.1%	●	□	No	Yes	Yes	Yes
Purbeck	40.0%	●	■	Yes	No	No	No
Sedgemoor	57.4%	●	■	No	Yes	No	No
South Gloucestershire	47.7%	●	■	Yes	Yes	No	No
South Hams	40.9%	●	■	No	No	No	No
South Somerset	49.0%	●	□	No	No	No	No
Stroud	56.6%	●	■	Yes	Yes	Yes	No
Swindon	82.2%	●	■	No	No	No	No
Taunton Deane	64.6%	●	■	No	Yes	No	Yes
Teignbridge	52.4%	●	■	No	No	No	Yes
Tewksbury	64.6%	●	■	No	Yes	No	No
Torbay	46.7%	●	□	No	Yes	No	No
Torrige	52.0%	●	□	No	No	No	Yes
West Devon	48.3%	●	■	No	Yes	No	No
West Dorset	48.2%	●	■	No	Yes	No	No
West Somerset	40.4%	●	■	Yes	No	No	No
Weymouth & Portland	52.2%	●	■	No	Yes	No	No
Wiltshire	64.9%	●	■	No	Yes	No	No

Source: ONS 2016-based sub-national population projections / Lichfields analysis of local authority documents

\* Including Local Plans and Joint Plans, where applicable. The following local authorities have Joint Plans: Cheltenham, Gloucester Tewkesbury; North Devon and Torrige; Christchurch and East Dorset; West Dorset, and Weymouth and Portland.

**Status of adopted Local Plan key**

- Local plan adopted within last 5 years
- Local plan older than 5 years but adopted post 2012 NPPF
- Plan adopted pre 2012 NPPF

**Status of emerging Local Plan / Local Plan review key**

- No emerging Plan / Plan review underway
- Initial stages
- Reg. 18 Draft Local Plan published
- Draft Local Plan submitted for examination



## Appendix 2: Appeal decisions

INSIGHT FOCUS  
APRIL 2019

Table 4: Appeal decisions

Address	No. specialist units/bedrooms	Housing type (as stated in the appeal decision)	Use class	Decision Date	Allowed (A)/ dismissed (D)	PINS Ref.
<b>South West</b>						
Land south of Cross Lanes, Lanstephan, Launceton, Cornwall	30	Age restricted (55 years +) bungalow/chalet bungalow dwellings	C3	11/02/2019	A	APP/D0840/W/18/3199163
The Knowle, Station Road, Sidmouth, East Devon	113	Extra care units	C2	22/01/2018	A	APP/UI105/W/17/3177340
Land off Tregenna Lane, Camborne, Cornwall	60	Residential care facility	C2	09/02/2017	A	APP/D0840/W/16/3142806
James House, Broken Cross, Calne, Wiltshire	6	Flatted units	C3	28/11/2016	A	APP/Y3940/W/16/3155069
Bosvale Community Centre, Hillside Road, Falmouth, Cornwall	75	Extra care dwellings	C2	11/10/2016	A	APP/D0840/W/16/3149721
Three Ashes Care Home, Ledbury Road, Oxenhall, Newent, Forest of Dean	72	Care home	C2	18/06/2015	D	APP/PI615/W/15/3002325
Field known as Day House Leaze, Wotton Road, Charfield, South Gloucestershire	60 bed care home / no. of sheltered units not specified	Dementia care home / sheltered housing	C2 / C3	27/11/2014	A	APP/P0119/A/14/2222175
Marden Farm, Calne, Wiltshire	85	Dementia care facility	C2	01/04/2014	A	APP/Y3940/A/13/2206076
Former Gas Works Site, Wharf Road, Penzance, Cornwall	60	Sheltered apartments for the elderly	C2	28/01/2013	A	APP/D0840/A/12/2179440
Land east of Quakers Walk, off London Road, Devizes, Wiltshire	139 extra care apartments/ cottages / 80 bed care home	Care village, including extra care apartments/cottages and a care home	C2	05/11/2012	A	APP/Y3940/A/12/2173814
Former Portishead Primary School, Slade Road, Portishead, North Somerset	51	Residential accommodation with care (supported independent living with care)	C2	09/10/2012	A	APP/D0121/A/12/2168918
4 Rowlands Hill, 18 and Garden House Cuthburga Road, Wimborne, East Dorset	49	Extra care assisted living retirement apartments for older persons	C2	27/09/2012	D	APP/UI240/A/12/2173491
Badgers Walk, Ferndown, East Dorset	38	Residential care apartments for the elderly	C2	14/05/2012	D	APP/UI240/A/11/2167331
<b>Other regions</b>						
Land to the rear of 237-259 London Road, West Malling, Tonbridge and Malling	79	Extra care	C2	19/12/2018	A	APP/H2265/W/18/3202040
8 Gainsborough Road, New Malden, Kingston-upon-Thames	6	Care home	C2	29/10/2018	D	APP/Z5630/W/18/3205595
Carlton Tavern, 140 Acomb Road, York	74	Care home	C2	22/08/2018	D	APP/C2741/W/18/3200194
Land West of Street 5, Thorp Arch Estate, Wetherby, Leeds	66	Care home	C2	12/07/2018	D	APP/N4720/W/17/3168897
Kenley Police Station, 94-96 Godstone Road, Kenley, Croydon	18	Care home	C2	19/06/2018	D	APP/L5240/W/17/3187576
81-87 Summerhouse Drive, Bexley, Dartford	60	Care home	C2	12/06/2018	D	APP/T2215/W/17/3185438
Land at West End Farm, Brackley Road, Buckingham, Aylesbury Vale	72	Extra care units	C2	05/04/2018	A	APP/J0405/W/17/3181140
Stable Field, Kidford Road, Wisborough Green, Chichester	30	Extra care units	C2	16/03/2018	D	APP/L3815/W/17/3180078
Balcombes Hill, Goudhurst, Cranbrook, Tunbridge Wells	113	Housing with care for the elderly	C2	14/06/2017	D	APP/M2270/W/16/3161379
Sandhurst Lodge, Wokingham Road, Crownthorpe, Berkshire	8	Serviced retirement apartments	C3	07/03/2016	D	APP/R0335/W/15/312881207

Source: Lichfields analysis of appeal decisions relating to older people's accommodation