

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

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			Planning Bureau on behalf of McCarthy & Stone

Method	Letter
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Date	5/12/2016
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Letter or Email Response:

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 Draft Local Plan 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). The "What Homes Where Toolkit" developed by the Home Builders Federation uses statistical data and projections from the Office of National Statistics (ONS) and the Department for Communities and Local Government (DCLG) to provide useful data on current and future housing needs. The table below has been replicated from the toolkit and shows the projected change to the demographic profile of the Epping Forest District Council between 2006 and 2033 : In line with the rest of the country, this toolkit demonstrates that the demographic profile of the Authority is projected to age. The proportion of the population aged 60 and over is projected to increase from 22.8% to 30% between 2008 and 2033 . The largest proportional increases in the older

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population are expected to be of the 'frail' elderly, those aged 75 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 Epping Forest District Council is a significant challenge and, unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population, 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 therefore commend the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population in Policy H1: Housing Mix & Accommodation Types and specifically sub-clause C) and paragraphs 4.5 and 4.6. We consider that the wording of Policy H1 is particularly strong as it encourages a range of accommodation to meet the diverse housing needs of the elderly including; supporting the delivery of specialist forms of accommodation such as sheltered retirement housing and Extra Care accommodation; a requirement for homes to be built to a standard that is suitable for the elderly, or easily altered to be suitable for the elderly, such as M4(2) or M4(3) of the Building Regulations; and, the retention of existing older persons' housing stock such as bungalows. Our only misgiving is over the wording sub-clause C) iii) which stipulates a requirement that housing for people with support needs is of an appropriate design to accommodate the required amenities and support staff. This is of course fundamental to delivery of such accommodation however we would argue that it is not in the interests of specialist providers to provide developments that do not meet the needs of their residents. Additionally, it raises the questions as to whether the Council has the requisite expertise in-house to determine whether the level of amenities and the design of such accommodation is appropriate and what parameters will be used in this assessment. The wording of this aspect of policy H1 is therefore considered to be unnecessary and imprecise. Policy DM10: Housing Design & Quality McCarthy & Stone built its first development in 1977 and over the past 39 years the Company has specialised in the design, construction and management of specialist accommodation for older people developing a wealth of experience in this particular sector. Extensive research both at pre and post occupation has been conducted to provide accommodation that is tailored to meet the specific needs of its residents. Meeting the requirements of the Technical Space Standards is, of course, desirable for all forms of accommodation and McCarthy & Stone aligns itself with best practice wherever feasible. Due to the nature of specialist accommodation for the elderly, apartments provided by McCarthy & Stone predominantly exceed the DCLG nationally described space standard. It is however problematic when design standards that have been prepared for 'general needs' housing are imposed on specialist older persons' accommodation. The DCLG - Nationally Described Space Standard is a clear example of this and is applied through either the number of bedroom or the number of people. The maximum number of residents in any McCarthy & Stone apartment is 2 - but there is no 2 bedroom standard for 2 persons in the National Space Standard. To clarify, McCarthy & Stone provides both 1 and 2 bedroom apartments for residents. A high proportion of additional bedrooms provided in the 2 bedroom apartments are however used for alternative purposes, such as a separate dining room or study. This is demonstrated in the results of a recent survey by the Company on occupancy. These show that the average occupancy of a one bedroom apartment is 1.194 persons and a two bedroom apartment is slightly higher at 1.275 persons. The Space Standards do not also account for the provision of communal facilities provided in these developments for the benefits of residents. There is, for example, a guest suite which all residents can use for overnight guests, provided as standard in McCarthy & Stone developments. It is difficult to see how the minimum standards in the National Space Standards would be applied to specialist housing developments with their correspondingly lower occupancy levels. It would appear wholly unreasonable to apply standards for family housing (i.e. 2 bedrooms: 3 persons) to such developments. Specialist providers have a clearer idea of the needs of their residents and a "one size fits all" approach to housing is counter-intuitive. Should the Council seek to apply the space standards we recommend that the standards should not apply to specialist forms of housing. It must also be noted that the application of the space standards could be challenging, and in many cases unfeasible, for all apartments in the highly constrained town edge of centre locations which are best suited for older persons' housing. Units that are smaller are occasionally required to facilitate designs that planning officers find acceptable, this is particularly the case where existing buildings are re-used or there are heritage considerations. Should the Council seek to apply the Space Standards, it is imperative that they are flexibly applied. Draft Policy SPS: Buckhurst Hill - Site Ref: SR-0176 McCarthy & Stone and Yourlife have submitted several proposals for an Assisted Living (Extra Care) development at St Just, Powell Road over recent years (Site Location Plan attached). The Company retains an interest in this site and believes that this site provides a rare opportunity to bring forward this much needed form of development in the Authority. The proposed development site comprises the greater part of the

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existing grounds of No.1 Powell Road which is currently designated as Green Belt. We consider this designation to be an anomaly as the site appears to fulfil no obvious Green Belt function. There can be no doubt that the site in question has a direct relationship to the Buckhurst Hill urban area and is perhaps one of the most "interrelated" sites throughout Epping Forest District being a predominantly lawned residential garden and is abutted on three sides by urban development. In our previous applications for the site its development has been presented and accepted as limited infilling. Officers have previously advised in the Officers Report to Committee that the "development of this site as proposed would not adversely affect the first three of the five purposes of including land in the Green Belt (para 80 of the NPPF) - i.e. checking unrestricted sprawl, preventing neighbouring towns merging and safeguarding the countryside from encroachment. The other two purposes (preserving the special character of historic towns, and assisting in urban regeneration) are not relevant in this context. Circumstances have not changed since that time. We therefore support the Council's proposed removal of this site (Site Ref:SR-0176) from the Green Belt and its promotion for residential uses. Given the size of land which is required for an Extra Care development and the lack of available alternative locations within Buckhurst Hill we respectfully request that the Council considers allocating, or at least referencing, the suitability of this location for Extra Care. Additionally the care services and facilities provided within an 'Assistant Living' development require a service charge to be levied on the occupiers of the units. A 'critical mass of units' is therefore required to ensure the service charge is affordable, this would not be the case with 30 units. We would require between 40-50 units for an 'Assisted Living' to be affordable for future occupiers. We note that Policy PS: Buckhurst Hill states that the quantum of development is 'approximate', however we consider that this site is a sustainable location and can accommodate higher density development, and could certainly accommodate the 'critical mass of units' required for an 'Assisted Living' development. We therefore respectfully request that reference is made in the wording of Policy P5 to this effect.