

# Exmouth Neighbourhood Plan – Submission Version Representation Form



The Exmouth Neighbourhood Plan has been prepared by Exmouth Town Council. It has now been formally submitted to East Devon District Council who are legally required to undertake public consultation.

**Please return this form to East Devon District Council by Wednesday 17 October 2018. Representations received after this time will not be accepted.**

## Part A – Personal Details Please note we cannot accept anonymous responses.

Personal Details		Agent's Details (if applicable)*	
Title		Title	Mr
First Name		First Name	Alex
Last Name		Last Name	Child
Job Title (where relevant)		Job Title (where relevant)	Director
Organisation (where relevant)	McCarthy & Stone Retirement Lifestyles Ltd, Churchill Retirement Living and Renaissance retirement	Organisation (where relevant)	The Planning Bureau Ltd
Address	100 Holdenhurst Road Bournemouth	Address	100 Holdenhurst Road Bournemouth



It is submitted that this approach is erroneous. Paragraph 2 recognises that specialist housing for the elderly which may include extra care provision appeals to the “*downsizing retirement market*”.

Through the NPPG, updated guidance on ‘Housing Need Assessment’, ‘Housing and Economic Land Availability Assessment’, ‘Local Plans’ and ‘Neighbourhood Planning’ were issued on 13<sup>th</sup> September 2018. Under the Section *Housing and Economic Development Needs Assessment* and in respect to the delivery of housing to meet the needs of older people the NPPG now states:

*The need to provide housing for older people is critical as people are living longer lives and the proportion of older people in the population is increasing.*

*The age profile of the population can be drawn from Census data. Projection of population and households by age group can also be used. Strategic policy-making authorities will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied.*

This advice recognises that:

1. There is a “critical” need for such housing
2. Providing housing that encourages downsizing should be encouraged
3. Health and social care cost savings will arise from such housing

The approach of the Objective and Policy appears to be to wish to cut the supply of further accommodation once the Local Plan target provision has been reached, appearing to suggest that further provision is a “bad thing”. This runs counter to the “critical need” approach of the NPPG and also to the well recognised fact that extra care in particular, in providing both housing and care brings about very considerable benefits (it is for that reason it lies at the very heart of the governments approach to care through fostering independence as far as is possible).

The NPPG also states that for strategic policy making, authorities will need to consider the needs for further older persons housing. For the Neighbourhood Plan to set a ceiling on such housing runs counter to this requirement.

It follows from (3) that such accommodation brings about improved health and well-being. Paragraph 5 by reference to “infrastructure problems” may infer that retirement housing brings about no such benefits. Once more, this runs counter to the NPPG position.

The application of local plan targets for extra care housing was considered in respect of a recent Planning Appeal at Sidmouth (APP/U1105/W/17/3177340 dated 22<sup>nd</sup> January 2018). Paragraph 66 of the decision states:

*Mr Blackshaw accepted during cross examination that the figure of 50 units was not absolute and exceeding the figure would not be grounds for refusal. Nowhere in the development plan is the figure expressed as a minimum and Strategy 36 in fact suggests that specialist housing proposals should be accompanied by a Care Needs Assessment which justifies the proposal’s scale, tenure and accommodation type. That assessment was undertaken for this proposal and has not been challenged by the Council. The evidence available suggests to me that there is a need for Extra Care units both across Devon and in Sidmouth. The Council also accept that efficient use of land is important and in the absence of any harm in respect of the main issues, it is clear that the site is capable of accommodating the number of units proposed. Consequently, I attach little weight to the anticipated number of units being exceeded in this case. (Emphasis added)*

The Inspector notes that the figures referred to in the Local Plan is not expressed as a minimum and that to do so would not therefore be appropriate. However this is precisely what the Neighbourhood Plan intends to do. **Proposed Policy H1 of the Neighbourhood Plan is also therefore contrary to the Local Plan**

It has to be said too that this approach runs contrary to the Neighbourhood Plan itself. Under the heading “Meeting identified Needs”, Paragraph 14 recognises the need for “*an amount of supported housing, not just for older people to make a downsizing move but also for younger people*”.....” If this is to be fully realized, it should not be constrained by ceilings on provision. It also refers to the need for housing “*to enable those who have a variety of health problems or disabilities to be as independent as possible*” In providing both Housing and Care, which is tailored to the individual needs of residents so as to foster independence, as far as is possible this is exactly what Extra Care housing is designed to do. No other form of housing does this as well as Extra Care, be it for older people or other sectors of the Community. Once more then it should not be constrained by a ceiling, particularly given the Local Plan requirement for I schemes being accompanied by an assessment of need anyway. If this shows a need, this should be addressed and not prevented by the imposition of a “ceiling” Paragraph 67 of the Appeal decision is also intuitive in respect of how extra care housing can meet wider housing needs and East Devon’ Council’s own acceptance of this:

*The proposed development, by its nature, would not attract young people to the area that might redress the concerns of an ageing population in Sidmouth. However, the Council accept that people moving into the scheme are likely to vacate other housing stock, many of which may be larger family homes. The scheme would, therefore, increase opportunities for younger people to occupy these homes. Many of the people occupying the scheme are likely to come from the local area, given that people tend to prefer to stay within their local community, a point stressed by the Council, and so I see no reason why the development should further increase the age profile of the town or exert undue pressure of local facilities such as healthcare. Indeed, the development may facilitate assisted living for residents that would otherwise require more formal Health Care*

This shows how such accommodation can help meet many of the needs identified in Paragraph 14 of the Neighbourhood Plan

Finally, the approach of the Neighbourhood Plan appears to be to provide what it calls “accessible and adaptable homes” (although what it means by this is not explained) as a replacement to specifically designed older person’s accommodation. Putting aside that, at the same time, it also supports such provision (Paragraph 14 refers), the approach is flawed in that there is no reason why the provision of further “*older person’s accommodation*” which Policy H1 seeks to stop can not sit side by side with “accessible and adaptable” homes. Given that specifically designed older persons accommodation is most likely to be level access and on level sites and built with accessibility and adaptability for older people at the fore, it stands a good chance of being equally if not more accessible and adaptable overall than other housing that may be delivered in Exmouth through the Local and Neighbourhood Plan. It should not therefore be restrained in this manner. Neither the Local Plan or the Neighbourhood Plan allocates sites for older persons housing in Exmouth. Therefore all sites must come forward as windfall sites. This does not restrict the ability for conventional housing development to also come forward.

If the intention of the Neighbourhood Plan is to simply stop more older persons housing, because it has a disliking for it, not only is this approach flawed, given that underlying this there must be a misunderstanding of the recognised benefits that such accommodation brings with it but it also runs contrary to government policy and guidance, the Local Plan policies upon which it is predicated and other policies of the Neighbourhood Plan.

**3. What changes would you suggest should be made to the plan?**

It will be helpful if you are able to put forward your suggested revised wording of any policy or text or suggested alternative policy boundary. Please be as precise as possible.

That the Objective be amended as follows:

Objective: Given the increasing demographic of Exmouth towards the elderly (Ref: Census 2011) priority should be given to developments which can be easily adapted for lifelong accommodation rather than age restricted developments. Beyond the 150 Care/Extra Care home spaces allocated for Exmouth in the Local Plan (Strategy 36), priority should be given to Accessible and Adaptable homes to ensure that the town has a balanced demographic.

That Policy H1 be amended to reflect Local Plan Strategy 36

Continue on a separate sheet if necessary

**4. If your representation is seeking a change, do you consider it necessary to speak at the examination?**

Please note this will not be regarded as a binding decision but will help us in our planning.

If you select No your representation(s) will still be fully considered by the independent examiner by way of written representations.

I wish to speak at the examination: Yes ~~No~~ (delete as appropriate)

Name/Organisation Please complete for each sheet	McCarthy & Stone Retirement Lifestyles Ltd, Renaissance Retirement and Churchill Retirement Living
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**5. If you wish to speak at the examination, please outline why you consider this to be necessary:**

Yes. In view of the commentary at Question 3, fundamental issues are raised with the appropriateness of the approach of the Local Plan to the provision of housing to meet needs in the town both in terms of the effectiveness of the approach and its relationship with policy and guidance at all levels

*Please note the examiner will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the examiner does not consider it necessary to hold a public examination consideration will be given by way of written representations.*

**Data Protection-** Any personal information which you provide will be held and used by East Devon District Council for the purpose of producing the neighbourhood plan and may inform other Planning Policy work. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at <http://eastdevon.gov.uk/privacy>.

Signed	A J Child
Date	17.10.18

A signature is required by the Planning Inspectorate. If filling in the form electronically it can be an ‘electronic signature’ by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the examiner.

**Please e-mail the completed form(s) and any additional information to [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk) or send to Phil Twamley, Planning Policy Section, East Devon District Council, The Knowle, Sidmouth, EX10 8HL**