

Strategy 36 – Lifetime Homes and Care/Extra Care Homes

Following a request from the Inspector, we submit comments to East Devon Council presenting required amendments to Strategy 36 to ensure the effective delivery of homes to meet the future needs of East Devon's ageing population.

These are presented by:

- Strategic Land Partnerships: a development company, based in East Devon, who have experience bringing forward proposals which include care housing, notably Care Homes in East Devon, Plymouth and Bath and North East Somerset; and
- Tetlow King Planning: a leading town planning and development consultancy with particular specialisms in housing and care.

The Strategy would benefit from the use of subheadings to separate the Lifetime Homes and Care/Extra Care Homes aspects.

General comments have already been made within written representations and at the Examination Hearings, as follows:

- The application of Lifetime Homes to all affordable rather than the 20% applied to market units is unjustified;
- The second paragraph indicating higher Lifetime Homes proportions in some areas is not sufficiently clear to enable delivery;
- There is no recognition of the various types of Specialist Housing which will be required to meet the needs of the ageing population;
- The presented targets, whilst supported in principle, are not sufficiently evidenced, with Devon County Council's 'Commissioning Strategy for Extra Care Housing' (September 2009), contained in the Appendix of the Council's Hearing Statement 2, using significantly dated statistics; and
- The policy does not sufficiently consider viability and the impact which it can have upon the successful delivery of specialist housing.

Lifetime Homes

We recognise that the Council have been instructed to resolve the issues raised in relation to Lifetime Homes. We make no detailed comments, but note that whilst it is important that an element of affordable housing is delivered to the Lifetime Homes standard, the Council should indicate a percentage requirement for number of the affordable units which must meet this standard based upon evidence of need, rather than a blanket requirement.

The HCA's HQI provide design criteria which seek to ensure the delivery of high quality affordable units. Lifetime Homes represents additional criterion which are not required to meet all of East Devon's housing needs, and represents an additional build costs which must be considered. A consideration of the proportion of affordable housing where the HCA's HQI provides an appropriate method of securing high quality and adaptable homes, rather than the higher requirements of Lifetime Homes, should be undertaken.

Care and Extra Care Homes

To ensure the effective delivery of specialist accommodation to meet the future needs of East Devon's population, we believe that this section requires additional detail both in the Strategy itself and in the accompanying explanatory text.

- Targets and Evidence Base: we support the Council's use of targets for care provision however as noted above, these are based on dated evidence. Noting that evidence base requirements have been raised in relation to other aspects of the Local Plan, should the Inspector seek additional assessments, the requirements for specialist accommodation should be included in any future assessment, in line with the draft NPPG. If this does not occur, the Strategy's explanation should reference the evidence base for the targets and note that they do not seek to meet all the Care/Extra Care needs of the District (and thus additional provision will be required) and also that subsequent revision to the evidence base will become material in the future. Given the role of the Villages DPD, see below, this adds emphasis to the requirement to undertake a more appropriate needs assessment, to ensure that the DPD and its associated allocations are based upon a robust evidence base.
- Ensuring effective and appropriate delivery: noting that the Council do not have a detailed evidence base and that need for Care/Extra Care accommodation is not easily confined to settlement-specific targets, the Council should make reference to the requirement for a Care Needs Assessment to accompany development proposals, thus allowing the Council to make a more informed decision on any development which comes forward.
- Types of specialist housing: there is no reference in the Council's Strategy to the full range of Care and Extra Care Housing models. This should be added, as per our recommendation below.
- Location of future provision: recognising that the Council have noted that settlements other than main towns should provide specialist housing, it is noted that this is not translated into the emerging East Devon Villages Development Plan Document (consultation draft January – March 2014). Given this document is based upon detailed Parish Council consultations and seeks to provide housing land to meet the village-specific housing targets, it would seem perverse that provision of Care/Extra Care accommodation was not considered, at least in the most sustainable of those villages. Through exclusion of this type of development, later proposals will have to come forward on sites which the Parish Council have not considered; indicating a failure to appropriately inform local communities of future development pressures. The Council must explore the opportunity of identifying suitable sites in the Villages DPD, reference to this should be made in Strategy 36.
- Land requirements: following the above point, the village and town development limits will be modified to reflect housing land requirements. Thus provision of Care/Extra Care is additional to this. The land values associated with standard housing sites typically render specialist housing developments unable to financially compete for identified or aspirational housing land. To ensure the effective delivery of specialist housing, the Council should consider allocation of sites specifically for the use, and add some additional detail in respect to windfall delivery, including the realisation that windfall will occur outside of development limits.
- Town Allocations: the Village's DPD does not consider the allocation of land within the District's Towns. The Council should consider the most appropriate mechanism for designating suitable sites in towns, to ensure effective delivery in line with viability issues and land availability.
- C2/C3: the various Care and Extra Care Housing models straddle the C2 and C3 Use Class definitions. Development's Use Class will be should be decided dependant on their particular characteristics and restrictions; and in the context of national policy, guidance and precedence. Noting that Strategy 34 (Affordable Housing) makes reference to flexibility based upon viability, community benefits or exceptional circumstances, it would be pertinent to include a cross reference in Strategy 36 given that this is frequently an issue which prevents, delays or stalls specialist housing delivery.

Example Policy Wording:

“Care/Extra Care and Other Specialist Accommodation for Older Persons

We will secure Care and Extra Care Homes and other specialist accommodation for older persons at all Towns and Larger Villages, at a minimum provision of:

- *150 Care/Extra Care Homes Spaces in Exmouth;*
- *50 Care/Extra Care Homes Spaces at Axminster, Honiton, Sidmouth, Seaton and Ottery St Mary; and*
- *10 or more Care/Extra Care Homes Spaces in larger settlements with a range of facilities, including access to a GP Surgery.*

Proposals should be accompanied by a Care Needs Assessment.

To deliver these targets and additional future needs, the Council will identify sites in the Villages DPD, encourage site identification in emerging Neighbourhood Plans and allow for windfall developments by the granting of planning consents in sustainable and appropriate locations. The Council will also explore the identification of suitable sites within the main towns.

Where proposals come forward outside of Built-up Area Boundaries, schemes should be located so they are accessible to local facilities, proportionate in scale to the locality and provide ancillary facilities as part of the development. These ancillary facilities should complement locally available amenities and be made available to the wider community.”

Explanation paragraph to insert:

East Devon has a significant and growing need for specialist older person’s housing. The term specialist housing encompasses a range of housing options, including Continuing Care Retirement Communities (CCRCs), Sheltered and Enhanced Sheltered Housing, Extra Care Housing, Care Homes and Retirement Villages. East Devon will require a range of housing options to meet its future accommodation needs across the District. Proposals for specialist housing should be accompanied by a Care Needs Assessment which justifies the proposal’s scale, tenure and accommodation type. The Use Class for a proposed development will be determined based upon the characteristics and restrictions of the proposed development, and in the context of national policy, guidance and precedent. When considering the application of Strategy 34 (Affordable Housing), the Council will have regard to the viability of the development, its wider benefits of providing specialist housing and community benefits, and the practicalities of delivering onsite affordable provision.

EDDC Response – Matt Dickins

In response to issues discussed at the hearing sessions and raised in the attached I consider that Strategy 36 of the plan could be beneficially revised to read:

Strategy 36 - Life time Homes and Care/Extra Care Homes: [@ 6.167](#)

Life Time Homes

On ~~small scale major~~ residential development schemes –(for 10 dwellings or more)— developers should demonstrate that all of the affordable housing and around 20% of market units will need to meet Lifetime Home standards unless viability evidence indicates it is not possible.

Where there are high elderly population levels in a settlement that substantially exceed East Devon average levels, for any planning application in that settlement, the council will seek to negotiate a greater proportion and/or a lower threshold for lifetime homes. The expectation is that the majority of units would be of two bedrooms or more.

Care/Extra Care Homes and Other Forms of Specialist Older Persn’s Housing

We will aim to secure Care and Extra Care homes in all of our Towns and Larger Villages in line with provision of:

- a) 150 Care/Extra Care Home Spaces at Exmouth;
- b) 50 Care/Extra Care Home Spaces at Axminster, Honiton, Sidmouth, Seaton and Ottery St Mary; and
- c) 10 (or more) at larger settlements with a range of facilities that have easy accessibility to a GP surgery.

Care/Extra Care home proposals will be acceptable on sites allocated for residential development (or which include residential uses as part of an allocation, though in such cases provision should be ‘off-set against the residential element/land). Proposals for specialist housing should be accompanied by a Care Needs Assessment which justifies the proposal’s scale, tenure and accommodation type. Where such provision is proposed on an allocated housing site the actual need for provision should also be established. The Council will take account of financial viability considerations, and overall contributions for affordable housing, where older person housing is proposed on or as part of a site for residential development and such provision impacts on site viability.

In respect of the paper submitted by Felicity Tozer I would not wish to comment in points raised in any detail though would make the following observations.

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As a general observation it is considered that the inclusion of suggested changes that refers to viability evidence address concerns about the financial implications of lifetime home provision.

Page 2 of Paper (items as depicted by - dashes -)

Item 1 – The references to care/extra care home provision do have an aspirational aspect to them and this is felt to be a reasonable policy position. It is not regarded that further evidence is needed in support of policy.

Item 2 – See suggested changes to policy in respect of Care Needs Assessment.

Item 3 – As drafted (noting changes) I would consider that policy coverage is appropriate.

Item 4 – I would see that the issues raised in respect of the Villages Development Plan Document are better addressed directly through this separate plan and do not require a direct local plan cross-reference. I do, however, intend to treat this specific paragraph as a comment on the villages plan and I can see merit as the villages plan progresses to consider potential for specific allocations. However I would not see the need to make any changes directly to the local plan.

Item 5 – I would not see merit or a basis to have policy provision for windfall developments (e.g. an exceptions type policy) for care/extra care homes, nor for criteria based policy to allow for such developments outside development boundaries. I do suggest changes to policy to refer to viability considerations but I do note that there is no hard evidence presented in the submitted document to indicate lower land values/returns for care home developments.

Item 6 – It is considered that any changes should be made to the local plan and matters can be considered independently as the villages plan progresses.

Item 7 – I would not see need for reference to use classes and other issues are addressed in Item 5, above.

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No comments other than in respect of matters addressed above and shown as suggested changes to policy. Whilst some reasoned justification for Specialist Older Person Housing could be included in reasoned justification I would not see this as essential or necessary. I do reiterate that I would not regard it as appropriate for plan policy to allow for schemes to come forward outside Built-up Area Boundaries.