



Hart Local Plan: Strategy and Sites 2016 – 2032

Hearing Statement

Matter 8 – Other Housing Related Policies

Representations

on behalf of

Crookham Care Village Ltd (ID: 170)

October 2018 | AM-P Ref: 18019



Inspector's Questions

1.0 Introduction

- 1.1 AM-P are instructed by Crookham Care Village Ltd to submit this Hearing Statement to the Examination on the Hart Local Plan 2016 - 2032. Previous submissions on behalf of our clients have been made throughout the emerging Local Plan process, in respect of Land at Cross Farm, Crookham Village.
- 1.2 This Hearing Statement is concerned with Matter 8 and is based on previous submissions and representations made on behalf of our clients and specifically addresses questions 8.9 – 8.12 raised by the Inspector in the Matters Issues and Questions document.

2.0 Q 8.9 – What are the identified needs for housing for older people, particularly residential institutions (Use Class C2)?

- 2.1 We do not believe the Council's has appropriately identified the needs for housing for older people within the Plan period.
- 2.2 As already been acknowledged by the Local Plan in paragraph 193, "over the plan period there is likely to be a very substantial increase in the number of older people residing within the District. The projected increase for the number of people aged 75+ years is relatively large, compared to the South East as a whole, or to the national average."
- 2.3 This is backed up with the following data which is based on the latest ONS estimates. As Table 1 shows, a substantial shift in the age profile of the population of the District is already underway. The current population of people sixty-five years of age or older living in Hart District is estimated to be 19,000. In the years to 2030 (close to the end of the Plan period) the number of people aged over 65 it is estimated to rise to 24,000, a 21% increase. This will further increase to 27,700 by 2040. The steepest rates of increase will be in the number of residents aged over ninety which will nearly double by 2030 and will rise by 211% to 2040. A growing number of which are presently living in under occupied family homes in the District.



Table 1 - Population aged 65 and over, projected to 2040 (Hart District)

	2018	2020	2025	2030	2035	2040
People aged 65-69	4,900	4,700	5,200	6,200	6,200	6,100
People aged 70-74	5,300	5,300	4,500	5,000	5,900	5,900
People aged 75-79	3,700	4,000	4,900	4,200	4,700	5,600
People aged 80-84	2,700	2,900	3,500	4,300	3,800	4,300
People aged 85-89	1,500	1,700	2,200	2,600	3,300	3,000
People aged 90 and over	900	1,000	1,300	1,700	2,100	2,800
Total population 65 and over	19,000	19,600	21,600	24,000	26,000	27,700

(Source: Office of National Statistics Census Crown Copyright 2018)

2.4 The proportion of the population sixty-five years of age or over in Hart District is above the national average for England (19.91% : 18.21%) and the margin widens over the period to 2035 (27.67% : 24.14%). For those eighty-five years of age and above the proportion in Hart District is higher than the average for England and the differential, although modest, widens over the period to 2040. The Hart District population is elderly overall, and it is characterised by a higher than average proportion of people in advanced old age. Table 2 sets out the detail of this aged and ageing population.



Table 2 - Total population, population aged 65 and over and population aged 85 and over as a number and as a percentage of the total population, projected to 2040 (Hart District)

	2018	2020	2025	2030	2035	2040
Total population	95,400	96,200	97,600	98,500	99,200	100,100
Population aged 65 and over	19,000	19,600	21,600	24,000	26,000	27,700
Population aged 85 and over	2,400	2,700	3,500	4,300	5,400	5,800
Population aged 65 and over as a proportion of the total population	19.91%	20.37%	22.13%	24.36%	26.20%	27.67%
Population aged 85 and over as a proportion of the total population	2.51%	2.80%	3.58%	4.36%	5.44%	5.79%

(Source: Office of National Statistics Crown Copyright 2018)

- 2.5 The above projections will mean that there will be a great proportion of the Hart District population which will require different care need into old age. To put this into perspective, those having difficulty with one or more domestic tasks will increase between 2017 and 2035¹ from 7,526 to 12,000. A failure to manage these tasks often persuades older people, or their relatives, of the need for a move to a high care setting, such as a Registered Care Home, when their needs would be better met in specialised accommodation, delivering specialist services adapting to the ageing process such as proposed on my client’s proposal at Cross Farm.
- 2.6 Similarly, those experiencing difficulty with at least one task of personal care are projected to rise from 6,146 in 2017 to 9,842 in 2035. This may contribute to additional demand for specialised accommodation but will also have a direct impact on demand for care home places. Residents aged eighty-five years plus shows that in the period to 2035 those who have difficulty in managing at least one mobility task

¹ The statistical data on which these numbers are based have not yet been revised in the light of the 2018 Population estimates and so rely on the 2016 projections which run from 2017 to 2035.



on their own will more than double in the District. This age cohort is a key group when looking at the transition into institutional care and will have an impact upon demand for specialised accommodation and support services.

- 2.7 Throughout the period to 2035 there is predicted to be an 87% increase in the population aged sixty-five and above that have dementia. This significant rise will again place increasing demand on care and accommodation places.
- 2.8 The above describes what will be the most significant social change in the District over the Plan period and it is our view that this needs to be proactively addressed in the Local Plan.
- 2.9 As stated in paragraph 195 of the Local Plan, the Council state that, “the 2016 SHMA estimates potential requirements for sheltered, extra care and residential care housing for the period 2014-2035. Most of the requirement is for sheltered (52 units per annum), enhanced sheltered (14 units per annum) and extra care housing (8 units per annum). This provision can be considered to be part of the mainstream requirement for housing. The need for residential care (33 units per annum) and nursing care (22 units per annum), is additional to the housing requirement set out in Policy SS1 and is typically Use Class C2 (Residential Institutional Uses) in planning terms”. This therefore equates for the need to provide approximately 129 units per year in the District.
- 2.10 We consider that this calculation is wholly inadequate and planning on this basis will result in significant undersupply over the Plan period. Table 3 below, based on the latest ONS data, sets out the scale of the issue in the District. It is our view that this calculation of need for older persons housing is a far more accurate assessment and better reflects the likely housing requirements for older person housing over the Plan period. The methodology used to calculate this is based on best practice and the advice in the NPPG.
- 2.11 The starting point for any consideration of future need is that of current supply. As table 3 demonstrates, the current supply is inadequate, so the baseline for estimating the required levels of provision is already in deficit. Table 3 sets out the scale of the deficit on the 2017 and provides a projection of the requirements to 2025.



Table 3 - Indicative levels of provision of various forms of accommodation for older people in Hart District

	Current provision	Current provision per 1k of Population 75+ in 2017	Level of under-provision 2017-2025	Resulting number of units		Provision per 1,000 of Population 75+	
				2017	2025		
				8,400	11,800		
Conventional sheltered housing for rent	287	34.16	217 - 421	504	708	60	
Leasehold sheltered housing	511	60.83	497 - 905	1,008	1,416	120	
Enhanced sheltered housing	For rent	0	0.00	84 - 118	84	118	10
	For sale	72	8.57	12 - 46	84	118	10
Extracare sheltered housing	For rent	74	8.80	52 - 103	126	177	15
	for sale	159	18.92	93 - 195	252	354	30
Housing based provision for dementia	0	0.00	50 - 71	50	71	6	

2.12 As table 3 above clearly sets out, the District is currently in deficit in all forms of housing for older people and that the requirement will only grow to 2025 and beyond. In particular, we point out that in relation to leasehold retirement housing there is an existing deficit of 497 beds and a requirement for a further 408 beds over the next eight years. In addition, there is no existing provision in the District for housing with care services. The figures set out in the SHMA pail into insignificance when compared to this estimate. We consider that the figures set out above should be used when planning for older people housing in the District. The figures set out in the Local Plan are inadequate and unsupportable and therefore ‘unsound’. Based on these figures in order to meet the need from the current level of provision to the requirement to 2025 approximately 232 beds per year will need to be provided. The Local Plan has failed to address the enormity of the issue and underestimates the District level of need for housing for older people. The Local Plan, in terms of identifying the needs of older people, is therefore not based on a sufficiently robust evidence base. It is short on numbers of future provision and restrictive on choice. Further, the absence of housing with care services provision included will continue to stretch adult social services and the NHS.

2.13 The history of the Cross Farm site in relation to the emerging Local Plan is well documented in our Regulation 19 submission. Therefore, our Regulation 19



consultation should be read in conjunction with this statement. As set out above, given the significant level of provision required to meet the housing needs of older people we are mystified as to why the site was removed from the Regulation 19 draft of the Local Plan. The removal of the site undermines the effectiveness of the Local Plan and in particular policy H4. Given the significance of the issue it is our view that the Council should be identifying more sites which are specifically identified to meet the needs older people, not removing them. The removal of Cross Farm was not based on the production of any new evidence base and therefore it was allocated in the Reg18 draft Local Plan on the basis of the same evidence base which has resulted in its removal from the Regulation 19 Local Plan. We consider that the allocation of the site is supported by the Council's evidence base, with particular reference made to the SHLAA – Site 116 and justified given the significant level of need set out above.

- 2.14 We consider that the reallocation of the Cross Farm site is required for the Local Plan to be considered effective and to meet the requirements of NPPF paragraph 50. Re-allocation of Cross Farm will directly address the significant level of need of older people housing in the District. The site can be considered 'deliverable' with a commitment to delivery within the first 5 years of the Local Plan period. We consider that this site should be reallocated and should be included in policy H4 as set out in our proposed modification in section 6.0 of this Hearing Statement.

3.0 Q 8.10 - Does the Plan do enough to ensure that the needs of older people are met?

- 3.1 The NPPF paragraph 50 is clear that "to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and 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, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)"

- 3.2 It is our view that the Council's proposed strategy set out in policy H4 does not achieve this and is therefore not in conformity with the NPPF. Policy H4 fails to ensure the needs of older people are met and will ultimately result in facilitating and worsening many of the issues set out in response to question 8.9 above.



3.3 The Council's proposed strategy for ensuring the needs of older people are met, as set out in policy H4, can at best be described as speculative and reactive. We make the following comments:

- As drafted the policy does not look to address the diverse needs of an ageing population by providing the necessary number and choice of housing for older people to meet their needs. As will be made clear, the profile of resident in the borough is heavily weighted to owner/occupier and the policy fails to provide the necessary choice and offer to meet this need and aspiration;
- The policy fails to provide a breakdown or the quantum/targets required to address the significant need for specialist housing in the District. It is our view that without such a target, this will lead to specialist housing being marginalised in favour of conventional housing (C3) to the detriment of the significant levels of delivery which will be required over the Plan period to meet need. This has already been illustrated at Hartland Village and Edenbrook, Hitches Lane;
- The policy fails to identify any specific deliverable sites where housing for older people will be provided. Note our response to Matter 4, where we set out our view that the planning permission secured at Hartland Village will not provide the necessary housing for older people envisaged;
- Only 45 units have been identified in the Council's housing supply, which is completely inadequate given the level of need set out above (Note our response to Matter 5);
- The policy does not give any details on the implementation and deliverability of housing for specialist housing. The policy is reactive and fails to address the significant problem in the District;
- Only requiring 15% of market units on schemes of five units or more to meet part M4 (2) (it is noted in paragraph 171 a number of potential 'exemptions' could be applied and that there is no requirement to meet part M4 (3) in market housing - policy H1) and leaving the requirement to meet Part M4 (2) and (3) in the affordable element of schemes on 10 units or more and to be justified on a site by site basis (policy H2) is completely inadequate and fails to fully address the issue; and
- The policy does nothing to ameliorate the present and growing pressure on the delivery of adult social services or relieve pressure on the NHS.

3.4 It is our view that policy H4 should reflect a strategy which sets out a fully robust pattern of provision that matches the aspiration of individuals and that of public policy. It is our view that this strategy should be based on the key elements of providing: 1)



appropriately designed accommodation; 2) accommodation which provides for a range of support and care services; and 3) provides specialised provision for those with the highest levels of need for care.

- 3.5 We consider that a strategy which is largely reliant on adapting existing homes, building a proportion of new homes to building Regs Part M (2&3) standards – Policies H1 and H2 and on home care services is tenuous to say the least. It is well documented that budgets and support services for the delivery of adaptations are already heavily squeezed and that domiciliary care services thinly stretched. There is no guarantee that home owners will make or be able to make the required alterations to their properties to enable them to stay in their own homes. Such alterations can be costly. This will also limit the value/appeal on resale thus diluting the supply of specialist housing stock. Purpose built specialist housing for older people is there in perpetuity. The outcome will be that older people will increasingly join those who already experience a “care gap”, placing them at increased risk and in all likelihood mean they have a much poorer experience of old age than a more appropriate setting would provide. Whilst a proportion of those with low to moderate needs may be supported in their existing dwelling in general housing this is dependent upon the design of the dwelling and secure access to appropriate levels of care and support. In reality such access cannot always be secured and even multiple care visits in the course of the day do not address the issues of loneliness, isolation and depression experienced by many older people living in general housing.
- 3.6 We consider that the Council’s proposed strategy is based on out dated pattern of care which is currently being shown to be inadequate. The Council’s strategy essentially ignores the “Retirement Village” concept proposed at Cross Farm which offers the growing need for care facilities as “built in” to the scheme to match the ageing process. This model is proven to significantly reduce pressure on existing local health and social services. This model proactively supports appropriately designed, accessible accommodation with access to flexible support and care services which can mitigate the risks, sustain independence and facilitate the delivery of care in a cost-effective fashion to moderate the demands that will otherwise fall on existing services as a consequence of these trends should be propose.
- 3.7 The propose strategy lacks attractive options for “right-sizing” older home owners which leads to an inefficient use of the existing housing stock. It is clearly in the public interest that older people should have an option that independent evaluation and public policy has endorsed as preferable to an increase in capacity for Registered Care Homes and offering a positive lifestyle in old age. A lifestyle that emphasises continuing capacity rather than incapacity and dependence.



- 3.8 Whilst public policy has traditionally focused on the needs of those older people who require socially funded rental accommodation, the trend among older people and the growth in homeowner equity has been toward an increasing level of downsizing owner-occupation in later life.
- 3.9 Hart District follows but exceeds the national trend toward owner-occupation as the dominant tenure for older people. Levels of owner-occupation among older people in the District are substantially above national averages at 89.45% for those between 65 and 74 years of age. In the oldest age group, the level of home ownership may be slightly depressed by lack of options for owner-occupation in specialised accommodation but remains at a striking 77%.
- 3.10 The whole thrust of recent legislation and guidance from national government has been to encourage the delivery of care and support to people in their own homes or where a move to a more accessible, manageable environment is indicated, to a setting that provides the characteristics of home: self-contained accommodation with a tenure of choice.
- 3.11 The local policy and strategic context supports the further development of housing and care options. Whilst, in the social rented sector this favours a particular model of Extra Care, it recognises also the range of models that may be adopted by commercial providers.
- 3.12 The volumes of new provision of Extra Care and related models of specialist accommodation for older home owners, set out on the Joint Strategy for Hampshire, will only be achievable through the facilitation of substantial private sector developments that will provide for that majority of older people looking to maintain their existing tenure of owner occupation. This need is under addressed in the Local Plan.
- 3.13 Within the District there is still a marked disparity in the availability of specialised housing for older homeowners compared with the supply available to older people in other tenures.
- 3.14 It is our concern that the consequence of the Council's strategy will be that without the provision described, older peoples' care option will be limited putting them at greater risk. This in turn will place increasing pressure on local health and social care services which are already stretched which is likely to lead to a reduction in the quality of life for many older people in Hart District.



4.0 Q 8.11 – Is criterion b) i) overly onerous?

4.1 We consider that this is overly onerous. The implication is that should such an application come forward in the Countryside an assessment would have to be undertaken looking at all other sites in the District capable of accommodating housing. Such an assessment could involve reviewing hundreds of sites across the District. How would an applicant be expected to know the deliverability of all these sites? For example, how would an applicant provide details of the availability of each site for development? Would the applicant be expected to assess all the existing constraints on each site and the implications for potential development for care homes purposes? It is acknowledged that care homes sites require very different characteristics to conventional housing which renders the majority of sites in the borough unsuitable for such housing. The Local Plan fails to provide sufficient detail on this criterion and is overly subjective and onerous. It should be deleted from policy H4.

5.0 Proposed Modification to Policy H4

Bold is new text and ~~strike through~~ is deleted text.

Policy H4 Specialist and supported accommodation

In order to address the significant level of housing need for specialist and supported accommodation within the District and ensure appropriate choice is provided, the Council will seek to provide a minimum 232 units per year over the Plan period.

Proposals for specialist and supported accommodation that meets the needs of older persons or others requiring specialist care will be permitted:

- a) on sites within settlement boundaries and ~~within the new community at Hartland Village~~ **Cross Farm**; and
- b) on sites in the countryside provided:
 - i. there is a demonstrated need for the development and ~~there are no available or viable alternatives within settlement boundaries~~; and



- ii. the site is well related to an existing settlement with access to appropriate services and facilities either on or off site.

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