

# The Planning Bureau Limited

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Via email: [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk)

2<sup>nd</sup> February 2024

Dear Sir / Madam

## **RESPONSE ON BEHALF OF MCCARTHY STONE TO THE RUGBY BOROUGH LOCAL PLAN ISSUES AND OPTIONS, OCTOBER 2023**

Thank you for the opportunity to comment on the Rugby Local Plan Issues and Options, October 2023 consultation. McCarthy Stone is the leading provider of specialist housing for older people. The following representation provides details as to the approach the Council should take towards meeting the specialist housing needs of older people and sets out recommendations for the Council to consider when setting policies to ensure the needs of older people are fully considered within the emerging Local Plan.

### **21. Should we adopt a minimum tree canopy policy for new development?**

NPPF para 16. identifies that 'plans should b) be prepared positively, in a way that is aspirational but deliverable'. Para 136 provides guidance specifically associated with trees and states '*Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-led, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users*'.

The Council should note that requiring a tree canopy cover, especially for small brownfield sites is not deliverable or realistic and could compromise sustainability development and is therefore contrary to NPPF. Any requirement would also need to be fully evidenced and the requirement incorporated into any forthcoming viability study.

### **22. Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site and, if so, where?**

Yes, the Council should identify and allocate sites for Biodiversity Net Gain.

### **24. Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development**

The Council should not require developers to prioritise the delivery of biodiversity net gain within close proximity of development. The Council should note that since the publication of the draft plan, the government have published the statutory metric and a draft PPG regarding biodiversity net gain. In light of the new guidance on BNG, the Council will need to review this policy area to ensure it fully reflects all the new legislation, national policy and guidance. The Council should also consider the spatial requirements within the metric as distance of off-site delivery is already considered within that.

We agree that the Council should seek a minimum of 10% Biodiversity Net Gain in line with legislation.

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**25. We are considering requiring all new residential developments to be net zero. Do you agree?**

No, however, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations. This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from [Written statements - Written questions, answers and statements - UK Parliament](#)) released on 13<sup>th</sup> December 2023. The ministerial statement confirms, with respect to the net zero goal that:

*'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one'.*

**27. Are there other climate change policies we should be introducing?**

See response to question 26.

**34. Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?**

The Council should initially recognise that the proposed changes in building regulations will require all homes to be built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed.

The Council should also note that it is common for Local Authorities to conflate the needs of 'wheelchair users' with the needs of older people in the community. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing (please see our answer to question 35) and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.

Whilst we acknowledge that PPG *Paragraph 003 Reference ID: 63-003-20190626* recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support", the Council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.

Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year.

We would also like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). M4 3 Housing, in particular, has a cost implication and additional space requirement that will serve to reduce the number of dwellings that can be delivered on a site, affecting affordability and further reduce viability.

The Council must therefore ensure that older people's housing and particularly extra care housing should be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it.

**35. Please provide any other comments you have on the type and size of new homes we need.**

Thank you for the opportunity to comment on the Rugby Local Plan Issue and Options consultation. McCarthy Stone is the leading provider of specialist housing for older people. Please find below our comments, which specifically addresses the need for specialist housing for older people and the benefits such housing can bring.

The following details as to the approach the Council should take towards meeting the specialist housing needs of older people and sets out recommendations for the Council to consider when setting policies to ensure the needs of older people are fully considered within the emerging Local Plan.

**National Policy Context**

Government's policy, as set out in the revised NPPF (December 2023), is to boost significantly, the supply of housing. Paragraph 60 reads:

*"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 63 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people. This now includes those who require retirement housing, housing-with-care and care homes.

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:

*"The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. Offering older people a better choice of accommodation to suit their changing needs can help **them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems**. Therefore, an understanding of how the ageing population affects housing needs is **something to be considered from the early stages of plan-making through to decision-taking**" (emphasis added).*

Paragraph 003 Reference ID: 63-003-20190626 recognises that:

*"the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support."*

Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:

*"plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require."*

Therefore, the Local Plan should continue to recognise that housing for older people has its own requirements and cannot be successfully considered against criteria for adaptable and accessible general family housing.

**Need for Housing for Older People**

It is well documented that the UK has an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates).

It is generally recognised (for example, within the Homes for Later Living Report September 2019). That there is a need to deliver **30,000 retirement and extra care houses a year** in the UK to keep pace with demand.

The age profile of Rugby can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 20,361 persons aged 65 and over in 2018, accounting for 19% of the total population of the Council area. This age range is projected to increase by 7,946 individuals, or 39%, to 28,307 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 22.4% of the total population of Rugby by 2043.

In 2018 there were 5,604 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 4,367 individuals, or 78%, to 9,971 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Rugby's residents, accounting for 5.2% of the total population in 2018 and increasing to 7.9% by 2043.

It is therefore clear there will be a significant increase in older people and the provision of suitable housing and care to meet the needs of this demographic rather than purely just adaptable homes should be a priority of the emerging Local Plan.

### **Benefits of Housing for Older People**

Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

### **Economic**

A report "*Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living*" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

A further report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "*Chain Reaction' The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)*" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

### **Social**

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

### Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

### **Recommendations**

The 2018 population projections from the Office for National Statistics shows a large increase in the population over the age of 65. For this reason and the requirements of the PPG, the Council should ensure specialist housing to meet the needs of older people is addressed and that older person's housing is not confused with wheelchair accessible housing, Lifetime Homes or other specialised housing.

The best approach towards meeting the diverse housing needs of older people is **for the plan to:**

- **Identify the older person's housing need.**
- **Allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services.**
- **Include a standalone policy actively supporting the delivery of specialist older people's housing with good access to services and facilities for older people.**

Developers of older person's housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments "**help reduce costs to the social care and health systems**" (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.

While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

***"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.***

***The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."***

We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the*

plan” (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council’s planning obligations and building requirements should therefore be robust.

We would also like to remind the Council that the viability of specialist housing for older people is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed in any forthcoming Local Plan Viability Assessment and if the typology is found to not be viable or less viable this should be translated into the Local Plan. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. *A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.* If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.

The Council must therefore ensure that an up-to-date viability assessment is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person’s housing and if older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.

We would direct the Council towards the Retirement Housing Consortium paper entitled ‘A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 (‘RHG Briefing Note’) available from <https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods.

Yours faithfully

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[Redacted name]