
From:
Sent: 17 January 2024 08:42
To: Local Plan
Cc:
Subject: Issues and Options Paper Representation
Attachments: Extra Care Housing Need Statement.pdf

Further to previous email re call for sites, please accept the following comments on behalf of Thurlaston Meadows Care Home Limited (TMCH) on the issues and Options Paper.

7. Climate Change Policies

TMCH support policies for zero carbon development (questions 25 & 26) and indeed this formed part of their recent proposed development at Thurlaston. Alternatively, perhaps a policy could be more encouraging with a 'presumption in favour of approving zero carbon development'?

It is considered however that the Local Plan should take a more rounded view on sustainability and climate change (question 27). For example, the current Local Plan places significant weight on location and not much else. In accordance with the NPPF when considering the sustainability of new development, the three main objectives of social, economic and environmental benefits should all be given substantial weight.

For example, the more efficient use of housing supports climate change. There is evidence of an ageing population of couples and single persons trapped inside large houses that could be put to more efficient use for families and larger households. Such housing could be released if there was a better alternative of extra care housing. The issue currently is that the location of such extra care housing is too restrictive in policy terms whereas it could be more or equally sustainable outside main settlements.

As an another example and something that national planning guidance has yet to be updated on is the dramatic change in lifestyles since Covid 19. The two significant changes are an increase in home working and retail. Both support a reduction in travel in accordance with sustainable development objectives. However, we are still assessing new development with the assumption that every occupant needs to travel which simply is not the case and is why Policy GP2 and similar policies need a radical rethink as not every development generates significant traffic. Extra care housing and care homes are one very good example. A significant number of services are provided on site such as health care, hot food, self-care (hairdressing/nails etc.), entertainment etc. The need to travel is generally limited to leisure trips and these can be made sustainable through green travel such as an electric taxi/bus service. So why is the location of such housing restricted to towns and larger villages? It is accepted that general C3 housing ought to be concentrated in locations close to employment and other facilities but the occupants of care homes and extra care housing do not travel to work, do not travel to school and generally have most things provided on site.

Green travel should also feature in the new Local Plan and perhaps under Climate Change policies. Communal green travel ought to be afforded significant weight in the determination of planning applications. After all, it is the damage cause by CO₂ emissions which has led to climate change so surely developments that provide green travel schemes should be strongly supported?

On tree canopy cover (question 21), I would urge some caution. Whilst a laudable objective, it might not be practical on some urban sites and equally on sites that already have significant tree cover. BNG is perhaps a fairer and more equitable policy that will also inevitably increase tree cover.

9. Land for Housebuilding

Question 31 – It is considered that the housing need identified by the professional evidence base should be followed, in this case HEDNA. To do otherwise can only result in an undersupply of housing and historically this approach nationally has contributed substantially to the current housing crisis. It does seem illogical to spend money on producing high quality evidence and then not follow it.

Question 33 – As stated under the Climate Change heading, it is a too simplistic approach to confine ALL housing to towns and main settlements. Whilst this approach is sound for general housing, it is inappropriate for care homes and extra care housing that requires a more flexible and more refined approach. For example, a number of extra care housing permissions have not been implemented (Herbert Gray College & Inwoods House) which suggests that new smaller retirement schemes than Lime Tree Village are not viable. The cost of support services such as healthcare, on site catering, security, leisure space maintenance and so on are significant. Accordingly, locations that already provide such services such as existing care homes should be considered favourably for extra care housing schemes. In fact, the current Local Plan has failed to provide any extra care houses save for Lime Tree Village which pre-dated it. Only flats have been built and even this has been limited to one scheme on Bilton Road. The location of extra care housing is deserving of a radical rethink as there is a critical shortage. There is literally no supply in the pipeline in the Borough despite an identified need of over 72 market units per annum.

Question 35 – Paragraph 9.13 of the Issues and Options Paper provides a very important message. It is a fact that the population is getting older and is the largest growth sector of housing need yet there are presently no proposals to meet the specific needs of this part of Rugby's population. The 2019 PPG on 'Housing for older and disabled people' describes the need to provide such housing as critical. In my professional opinion, this need is a housing crisis in Rugby Borough. Given all this evidence, the Local Plan housing land supply must allocate land specifically for extra care housing. The table under paragraph 9.21 omits extra care housing and this is wrong. Simply allocating housing land will not solve the extra care housing crisis. For example, none has been provided at Houlton and none is presently proposed at Homestead View. Accordingly, the Local Plan needs to have a specific extra care housing quota within its housing provision policy and not just as supporting text. It also needs to be allocated. Robust policies are needed to ensure that extra care housing is provided in Rugby Borough that meets the needs identified by the evidence base.

In respect of the evidence base, it is considered that a more robust and refined approach is needed to extra care housing in Rugby Borough which the previous SHMA achieved. It is considered that the HEDNA is not sufficient on addressing this issue and further work is needed. The data is now out of date and it is not possible to verify the existing provision stated in the document.

I've attached an extra care housing need assessment in support of the refused Thurlaston Meadows Retirement Scheme to assist in more detail with the issues raised by this representation.

As previously offered, I would be pleased to meet on the extra care housing need issue and assist with our expertise in this area.

Please acknowledge receipt.

Kind regards



Extra Care Housing Need Statement

Client: Thurlaston Meadows Care Home

Project: Retirement Village



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1.0 Introduction

- 1.1 Land & Planning Consultants Limited has been instructed by Thurlaston Meadows Care Home to provide professional advice on its property and current planning application reference R20/1030. The applicant is stated as Eastdene Investments Limited.
- 1.2 The proposed development is part of the expansion and rationalisation of Thurlaston Meadows Care Home in application reference R21/0152 and comprises 35 extra care units together with new facilities to include a Multi-Use Games Area (MUGA) (incorporating tennis courts), bowling green, health/fitness facilities with creche, shop/community building and a bus service.
- 1.3 This statement focuses on the need for extra care housing in Rugby Borough which is considered to be of critical importance.

2.0 Extra Care Housing Need

- 2.1 The need for extra care housing was touched upon in the planning statement by APC Planning that originally supported the planning application. The evidence in this statement expands upon the need identified with updated statistics on need and provision within Rugby Borough.

Planning Policy

- 2.2 Rugby Borough Local Plan (RBLP) adopted June 2019 is considered to be the starting point for extra care housing provision in Rugby. Policy H6 entitled Specialist Housing encourages extra care housing provision and states that:

“...the Council will have regard to the following:

- The need for the accommodation proposed, whereby the development contributes towards specialist housing need as identified within the Strategic Housing Market Assessment (SHMA); and...”

- 2.3 The supporting text explains that the SHMA (Strategic Housing Market Assessment) identified a significant increased need for specialist housing for older people. The need for extra care housing is specified in paragraph 5.40 as an annual requirement of 72 extra care units and 22 affordable units, thus a total of 94 units per year.

National Policy

- 2.4 The NPPF supports housing provision for older people within its overall objective of significantly boosting the supply of homes (paragraphs 60 and 61).
- 2.5 The government PPG dated June 2019 on “Housing for older and disabled people” is more specific and sets the context for the significant need for extra care housing. It 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.” (paragraph 001)

- 2.6 A recent Age Concern report updated the above statistics using the same ONS data. The projected increase in the population aged 65+ between 2023 and 2043 is an additional 4 million people. The population aged 85+ is also still projected to rise rapidly.
- 2.7 The provision of specialist housing to meet this sector of the population is therefore of grave concern and recognised as of critical importance by the government.

SHMA Update

- 2.8 The Local Plan figures are based upon the December 2015 SHMA which is now out of date.
- 2.9 The SHMA has recently been updated by the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 dated November 2022.
- 2.10 Unfortunately, HEDNA uses 2011 census data which is not the most recent data. However, it does demonstrate that at least 18,1% of Rugby's population is presently over the age of 65+.
- 2.11 HEDNA further demonstrates that the shortfall in housing with support and housing with care is a combined total of 765 units in the market (private) sector between 2022-2032. The current supply figure is doubted (see next section) so it is likely to be greater than this. However, the HEDNA figures clearly evident a need now for 77 extra care market units per annum on top of existing provision.

Current Provision

- 2.12 It is important to first define 'extra care housing' before analysing current provision statistics. A detailed explanation is provided at: www.warwickshire.gov.uk/extracare. In summary, it is independent purpose-built accommodation that can be for sale, rent or shared ownership that usually has a range of facilities on site, with 24-hour care and support services on hand.
- 2.13 The Council's AMR (2021-2022) confirms the current provision of extra care housing on its page 14. The only recently constructed extra care housing scheme is the McCarthy and Stone development on the former Oakfield Recreation Ground on Bilton Road. The AMR contains an error as no bungalows have been provided and planning permission reference R19/1164 is solely for 62 apartments as also confirmed by McCarthy and Stone's website. Now named Knox Court, it provides very limited facilities of a communal lounge, bistro (opening hours not available) and an on-site manager.
- 2.14 Planning permission reference R18/1811 does include 78 extra care units at Herbert Gray College in the town centre. However, the case officer confirms no progress since its approval November 2021. It is a complicated site with a listed building(s) and was originally due to receive a £2M Covid based grant. It is considered that the project is now unviable especially as the grant is no longer available. It can therefore no longer be considered to count towards extra care housing provision.
- 2.15 The only other applicable site is Inwoods House off Ashlawn Road which is the former CIA Insurance building. Planning permission reference R20/0213 granted consent for 11 extra care bungalows and 40 extra care apartments. The consent expires in November 2023. Whilst limited progress has been made on the planning conditions, an alternative application for 22 dwellings is now pending on the site (R23/0491) which

suggests that the extant consent is not viable or that the developer is not committed to the scheme. The pending application is unlikely to be determined before November 2023 and given this, the extant consent will inevitably expire and thus the site cannot count towards extra care housing provision in Rugby Borough.

- 2.16 The only other consent since the publication of the Local Plan is recent approval R23/0235 for 5 extra care cottages at Lime Tree Village which is considered to be viable and should therefore count towards provision in the Borough. Whilst there has been previous expansion and another recent consent at Lime Tree Village, these relate to previous approvals and thus are not new provision since the adoption of the RBLP.
- 2.17 RBLP Policy H6 does require extra care housing provision on SUEs but none is proposed at Houlton as confirmed by the case officer and there are no consents or applications to date on the South West Rugby SUE despite numerous developments already along Ashlawn Road. Whilst the SPD mentions extra care housing, there is no definite requirement mentioned and the Homestead View website is silent on extra care housing.
- 2.18 In conclusion, extra care housing provision since the adoption of the Local Plan comprises 62 apartments which are now built and a consent for 5 cottages. There are no other consents that are likely to be implemented and no planning applications pending for extra care units except for Thurlaston Meadows.

3.0 Summary & Conclusions

- 3.1 The government PPG describes the shortage of housing for older people as ‘critical’. The UK population is getting older with an additional 4 million people aged 65+ between 2023 to 2043.
- 3.2 Whilst we are living longer thanks to technological advancements in healthcare, this does bring challenges in terms of mobility and other areas; such that these people need support but are trapped in their large homes that are not suited to meet their needs.
- 3.3 Policy H6 in the Local Plan (June 2019) specifically supports such specialist housing and the supporting text confirms the need as 72 private and 22 affordable extra care units per annum. The latest joint Council assessment entitled HEDNA confirms that at least 765 extra care units are needed between 2022-2032. It is considered that the actual need will be greater than this given doubts over provision and use of 2011 census data.
- 3.4 Since the adoption of the Local Plan, only 62 extra care apartments have been approved and built and only 5 extra care cottages are permitted and will be provided. It is considered that there are no other viable planning consents and as yet, no extra care housing is committed on either of Rugby’s SUEs contrary to Policy H6.
- 3.5 Given the above, there is a minimum current shortfall of 226 private extra care units between June 2019 and June 2023 and the need between 2022-2032 with the 5 cottages at Lime Tree Village permitted is at least 760 private extra care units with no permissions or Local Plan allocations to meet this vast need.
- 3.6 It is considered therefore that the shortage of extra care housing in Rugby Borough is worse than critical. Given this, the need for extra care housing should be given very substantial weight in the planning balance.