Suffolk Coastal (East Suffolk) Local Plan
Examination Hearing Statement

Matter 1 – Procedural / Legal Requirements - Sustainability Appraisal

Prepared by Strutt & Parker on behalf of M Scott Properties Ltd
August 2019
Context

1. This Hearing Statement is prepared by Strutt & Parker on behalf of M Scott Properties Ltd (hereon referred to as ‘Scott Properties’), who have engaged in the preparation of the Emerging Local Plan (eLP) throughout the plan-making process. This Statement responds to the Inspector’s MIQs in relation to our Final Draft Local Plan (FDLP) representations.

2. Scott Properties is a developer and specialises in accommodation for older people and those living with a disability. They are seeking amendments to the FDLP to adequately meet the identified needs of these groups of people. Specifically, they are promoting land to the north of Heathfields, Trimley St Martin, for specialist accommodation for those aged 55 and over, as well as those with, or supporting someone with a disability. This site was assessed within the Issues and Options Consultation Document (reference 372), as well as the Initial Sustainability Appraisal (2017). It was also considered as potentially suitable for development within the draft SHELAA (2018), although not taken forward as a preferred option or an allocation within the FDLP.

3. Land north of Heathfields has been promoted consistently for specialist accommodation, suitable for those aged 55 and over as well as those with or supporting someone with a disability. The site was assessed as potentially suitable for development within the SHELAA (2018), although the reasons given for discounting it were that sites SCLP12.65 and SCLP12.66 were deemed more suitable. Despite having been promoted throughout the Local Plan Review Process for specialist housing, the site was incorrectly assessed for general housing within both the Strategic Housing and Economic Land Availability Assessment (December 2018) (SHELAA) and the SAR. It is therefore considered that this site has not been properly assessed in accordance with its intended use, nor has the Council sought to identify sites which could help meet the need for specialist accommodation. We therefore consider that this failure renders the plan unsound, given that this need cannot and will not be met in full within the FDLP.

4. Representations have been made throughout the Local Plan process on behalf of Scott Properties to encourage the Council to include policies to meet the needs of older people, through the allocation of specific sites or exception policies.

5. This Hearing Statement addresses Matter 1 – Sustainability Appraisal. We have sought to avoid repeating points made in our FDLP representation, but do expand upon these here where relevant.

6. This Hearing Statement is supported by a Needs Assessment; provided at Appendix 1.
Matter 1 – Sustainability Appraisal

Questions

1.2 Is the Sustainability Appraisal (SA) adequate?

1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?

1.4 Has the SA taken into account reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

Summary

7. The SA is not adequate or robust in relation to meeting the needs of an ageing population, which is identified as a Key Issue and a Strategic Priority in the evidence base and the FDLP.

8. Whilst the FDLP has sought to identify a range of sites to come forward in numerous settlements, it is considered that the Council has failed to include sites capable of delivering specialist accommodation to respond to local demographic needs. That failure includes sites in Trimley St Martin that were promoted for the specific needs of older people. The SA has failed to adequately assess the policies in regard to meeting the needs of the ageing population and has scored certain policies highly favourably when those policies are not convincingly able to deliver against those needs.

9. To rectify this, the SA should be reviewed in relation to Objective 2 – Meeting the Requirements of the Whole Community; Objective 3 – Improve the Health of the Population Overall and Reduce Health Inequalities, and; Objective 4 – Improve the Quality of where People Live and Work. Where the FDLP is found not to score positively against those objectives (and we consider that it would not), the FDLP should include more effective policies to address the specific needs of older people.

Inconsistencies in the SA

10. The SAR assesses both allocated and alternative sites against the SA Objectives on an inconsistent basis. Those which are subject to an allocation have been measured against the merits of the allocation policy, as opposed to the site’s characteristics for certain categories, which clearly places non-allocated sites at a disadvantage and on this basis renders them unable to be properly assessed against the SA Objectives.
11. It is also noted that the SAR is inconsistent with the Strategic Housing and Economic Land Availability Assessment (December 2018) (SHELAA). Allocation SCLP12.66 scores amber against both utilities capacity and flood risk in the SHELAA Suitability Assessment due to potential Water Recycling Centre capacity issues identified by The Water Cycle Study, and, a surface water flood risk in the middle of the site. The SAR, however, fails to recognise this against SA Objective 11 (to reduce vulnerability to climatic events and flooding) against which it scores ‘+'. In comparison, site 372 (land north of Heathfields) scores ‘-' against this SA Objective due to the site being subject to surface water flooding. Although this site also scores amber in the SHELAA Suitability Assessment against flood risk, this is described as ‘small areas of surface water flooding in the south west fringes of the site’. It is therefore considered that the approach to site assessment is both inconsistent and inaccurate with a clear, resulting in an unjustified and unsupported approach to allocating sites.

12. Both the SAR and the SHELAA assessed sites submitted for general housing, and did not assess their potential suitability for any other type of housing. This includes site 372 (land north of Heathfields), which has consistently been promoted throughout the Local Plan Review process for specialist accommodation suitable for those aged 55 and over, as well as those with or supporting someone with a disability, as opposed to general housing. It is therefore considered that this site has not been properly assessed in accordance with its intended use, and, for the reasons explained above, nor have the criteria in the SAR or the SHELAA been applied consistently in comparison to other sites.

13. In addition to the above, when the Council assessed the alternative options for meeting the needs within specific settlements, subjective terminology such as “more suitable” should not have been used, and robust evidence should instead take its place. We are unclear as to how sites SCLP12.65 and SCLP12.66 are more suitable giving their inability or unwillingness to address the needs of an ageing population – this is addressed in more detail as part of our Matter 3 Statement.

The Needs of an Ageing Population

14. The SA Scoping Report May 2018 P.54 identifies that the population is older than the county, regional and national averages. Under an assessment of the Key Objectives (p.147) the table includes Lifetime Homes and to provide a range of housing to meet the needs of the ageing population through appropriate housing options and standards.
15. The need to identify and assess the number of homes needed within the District and to quantify the size, type and tenure for different groups of people is set out in paragraph 61 of the NPPF. In relation to Older People, the definition in the NPPF includes a wider group that that identified in the FDLP Policies, including “people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs”.

16. This is further informed by recently published additions to Planning Practice Guidance (PPG) regarding the housing needs of older people (ID: 63-001-20190626 to 63-019-20190626).

17. The SHMA has identified a need for specialist accommodation, being sheltered housing, enhanced sheltered housing, and extra care housing at a total of 1,287 units by 2036 and a further 1,118 spaces for registered care (FDLP para.5.42). It is not clear whether these types of accommodation cover the range set out in the PPG ID:63-010-20190626, which includes age restricted market housing, retirement living (and sheltered housing), extra care housing and residential care homes. In failing to identify the needs of the full range of older people, the SA cannot have adequately assessed the policies to achieve these objectives and the SHMA is likely to have underestimated the actual need – an extract from Matter 2 has been included which highlights this.

“The SHMA has identified a need for 1,287 specialist units and 1,118 for Registered Care by 2036. This would assume based on an occupancy rate of 1.9 per dwelling that 2,445 people over the age of 65 would choose to live in specialist accommodation. This figure based on ONS projections up to 2035 would mean of the 50,000 people aged 65 and over in the Suffolk Coastal District only 5% would choose to live in specialist accommodation. Given the Council’s definition of Sheltered Housing is so broad, it seems this figure of need is highly underestimated. This is supported by our own need’s assessment (supported by Experian Data) at Appendix 1.”

18. This matter was raised in earlier stages of plan preparation and could have been resolved prior to submission of the Plan. Scott Properties provided a demographic report highlighting the importance of a changing age profile in the district. This situation is reflected again in the more recent Needs Assessment provided at Appendix 1. This shows that there is a potential requirement for 190 new homes suitable for people aged 60 and over by 2022 in Trimley St Martin and Trimley St Mary alone. Therefore, it is conceivable
that this requirement could be considerably greater than this, especially across the remainder of the plan period to 2036. Given the lack of specific allocations for specialist accommodation within the FDLP, combined with no specific quantum of homes stated in the few policies which do provide for this, it is doubtful whether this need will be met in full.

**Trimley St Martin**

19. The FDLP allocates two sites in Trimley St Martin: Land off Howlett Way (SCLP12.65) and Land adjacent to Reeve Lodge, High Road (SCLP12.66). Commentary in the December 2018 SA Report states that Site 372 was not included because “it was deemed Site 511 (site allocation: Heathfields SCLP12.66, along with carried over allocation SCLP12.65) is a more suitable site. Site 511 provides; an opportunity to locate the new primary school; in a location which is well related to the population; and provides potential for benefits related to locating uses to encourage interaction in a focal part of the village”. This judgement in the Assessment is considered to have overlooked the promotion of the site for older person’s accommodation, in combination with an overly optimistic expectation for other sites to meet this need. Accordingly, Site 372 should have been included in the FDLP as it was assessed as being suitable, and in addition it is seeking to deliver housing that is less likely to be delivered elsewhere. The specific promotion of the site for older person’s housing should have scored favourably in the assessment.

20. The FDLP seeks to meet the needs of older people on other site allocations. The criteria for policy SCLP12.65 (Land off Howlett Way) do not contain any requirement for the 360 dwellings to make provision for specialist accommodation, only for a range of housing types and tenures provided in keeping with the surrounding area. This is despite the supporting text stating at 12.742 that public consultation responses highlight a need for dwellings targeted at the retirement market, and, acknowledgement of this text within the Plan Viability Study (January 2019) (PVS).

21. The PVS assesses allocation SCLP12.65 as viable with 1 in 3 units affordable, stating at 5.52 that this is because the site density is much higher compared to other sites tested in the mid-value zone. To assess the viability of the site, the housing mix was assumed as comprising a mix of housing and flats to achieve the higher density proposed in this policy wording. The PVS later states in the table in Appendix 1 that it assumes elderly accommodation is delivered through bungalows as part of the housing mix. From this, it follows that site SCLP12.65 may not have been assessed at all for specialist accommodation suitable for an older population.
22. Given the high density of this allocation, and that it is deemed viable based on a housing mix comprising 18% flats, we consider that this site cannot and will not be able to offer a level of specialist accommodation that meets the identified need, or housing suitable for older people to meet identified need in the locality. If the housing density required of this allocation can be achieved through houses and flats only, it is suggested that bungalows will not be viable or possible on site, given they require a significantly larger land take than conventional housing consisting of two or more storeys.

23. Given the inability of this site to provide specialist housing, or housing suitable for older people, we feel that it has been assessed artificially positively in the Sustainability Appraisal Report (December 2018) (SAR) against SA Objective 2 (to meet the housing requirements of the whole community), achieving the highest score ‘++’. The assessment states that this site would “increase housing stock and provide a range of housing types and tenures.” This is inconsistent with the PVS, which assumes that, given the density required on site, a viable housing mix is one which comprises housing and flats only. We also question whether this site is capable of achieving the highest score against SA Objective 2 when compared to other sites, such as SCLP12.66 (as discussed below), which include specific reference within the policy to make provision for housing for older people.

24. Through either its allocation or the amendment of policies elsewhere within the plan to provide greater flexibility for such schemes, the land to the north of Heathfields, Trimley St Martin can be delivered within the next five years and can assist in meeting specific identified local need, as demonstrated in the attached needs report, which we do not consider will be otherwise met through the FDLP.

25. SCLP12.66 (Land adjacent to Reeve Lodge) is the only other allocation within Trimley St Martin that could potentially contribute to an identified local need, as identified in the Needs Assessment at Appendix 3 that accompanies this report. The policy wording does include the need to include housing for older people, in both the supporting text (paragraph 12.760) and the policy itself. Both the policy and supporting text, however, lack any explicit reference to the quantum of provision that the development is expected to deliver. In addition, and as stated in our response to Matter 3, the promoter of this site has expressed concerns about the requirement to deliver accommodation for older people.
26. We therefore raise concerns that:
   a. These allocations will not come forward as anticipated, and whether they will in fact provide far fewer homes for older person's or specialist accommodation, despite it being a policy requirement;
   b. There is an assumption that traditional market housing developers will deliver specialist housing for older people, which at present they do not;
   c. The Council has assumed a very low specialist housing figure despite evidence being submitted at previous stages of the Local Plan to demonstrate otherwise.

Proposed Modifications

27. The SA does not adequately assess the policies that would be expected to deliver against the objectives of meeting the needs of the whole community, with regard to the needs of an ageing population and the anticipated housing requirements. The policies proposed do not adequately ensure the delivery of such housing, while the scoring against these objectives is positive. It is therefore considered that the SA should be reviewed in relation to whether the policies do, or do not, meet the stated objectives for Objective 2 – Meeting the Requirements of the Whole Community; Objective 3 – Improve the Health of the Population Overall and Reduce Health Inequalities, and; Objective 4 – Improve the Quality of Where People Live and Work.

28. Where the FDLP is found not to score as positively against those objectives as currently stated, and we consider that it would not, the FDLP should include more effective policies to address the specific needs of older people. Recommended policies are provided by Scott Properties in relation to Matter 2.
Appendix 1 – Needs Assessment
Summary of Experian Data - Current (2017) to Projected (2022)

<table>
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<th>Age bands</th>
<th>Area - Current</th>
<th>Area - Projected</th>
<th>Base - Current</th>
<th>Base - Projected</th>
<th>% of change in Area from C</th>
<th>% of change in Base from C</th>
<th>Difference</th>
<th>Additional Residents Area</th>
<th>Additional Residents Base</th>
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Population Analysis

- Population aged 60+:
  - Area: 1,420
  - Base: 1,681
  - % of Population aged 60+:
    - Area: 26%
    - Base: 30%
  - % of Population aged 65+:
    - Area: 35%
    - Base: 38%

Existing Housing Stock and Occupancy

- Total Properties in Study Area: 709
- Total Bungalows in Study Area: 96
- Proportion of Bungalows in Study Area: 14%
- Average Occupancy in Study Area: 7.60

Housing Need Analysis

- Proportion of Local New Housing Need for People Aged 60+:
  - Area: 139%
  - Base: Negative

Part 1 - New Homes Requirement for Additional Residents Aged 60+ by 2022:

- Area: 137
- Base: 26

Part 2 - Potential New Homes Requirement for Existing Residents Aged 60+ - Headline Figure:

- Area: 52
- Base: -

Potential New Homes Requirement for Existing Residents Aged 60+ - Net Figure:

- Area: 52

Total Potential New Homes Requirement for Local Residents Aged 60+:

- Area: 190
- Base: 26

Assuming 32% of residents would prefer to live in a bungalow as per info above:

<table>
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<th>Year</th>
<th>Area</th>
<th>Base</th>
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<td>2035</td>
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</table>

Health issues by 2022 affecting those 65 and over

- Area
- District
- Cost of falls per year: £162,353 (6,045,000)
- Number of people with depression: 85 (1,168)
- Number of people with mobility issues: 107 (1,959)
- Number of people living alone: 194 (712)
- People who need help with at least one domestic task: 280 (107,291)

Notes

- L&G Report on ageing
- The % of older people that would consider moving: 32%
- The % of older people that would actually move: 7%

Assumptions

- Expected occupancy rate for Specialist Accommodation for the over 60s: 1.90