Suffolk Coastal Examination in Public (East Suffolk Coastal) 
Hearing Statement

Representor number: TBC

Matter: 2

On behalf of Landform Martlesham Limited

1.0 Introduction

1.1 This Hearing Statement has been prepared by Barton Willmore Planning on behalf of Landform Martlesham Ltd (Landform), with technical support from Barton Willmore Development Economics and Retirement Villages Group Ltd in respect of the Inspector’s Matters relating to accommodation for older people.

1.2 In respect of Matters relating to self-build, technical support has been sought from the National Custom and Self Build Association (NaCSBA).

1.3 Landform control a 17.5ha site lying to the east of Felixstowe Road and the south of Three Stiles Lane in Martlesham, located approximately 9.3km to the east of Ipswich Town Centre and 3.5km southwest of Woodbridge. Landform is promoting the site for a mix of residential C2 and C3 uses (including a proportion of Self Build and Custom Build).

1.4 Retirement Villages are an extra care operator specialising in bespoke retirement developments of approximately 80-90 units. They currently operate 14 developments across the country. Landform is working with Retirement Villages to develop proposals for C2 extra care leasehold units at Felixstowe Road, Martlesham.

1.5 Landform prepared representations to the Site Allocations and Area Specific Policies Document dated 31 May 2016, the Call for Sites dated 31 October 2016, the Issues and Options Local Plan dated 27 October 2017, the First Draft Local Plan dated 13 September 2018 and most recently the Pre Submission Draft Local Plan dated 21 February 2019.
2.0 **Response to Inspector’s questions**

**Matter 2: The Suffolk Coastal Spatial Strategy**

**A. Housing Provision**

**Issue: Is the overall strategy and provision for housing development effective and justified?**

Q2.5 *Does the plan adequately address the needs of different groups in the community as set out in paragraph 61 of the Framework.*

2.1 The Council must take account of the recent Planning Practice Guidance (PPG) on housing for older people and the requirement to establish how specialist housing will be provided to meet their needs. The Council must identify sites that will properly provide for the delivery of retirement accommodation. In addition, paragraph 63-013 of the PPG states that ‘it is upon the plan making body to recognise that allocated sites should be in proximity to good public transport, amenities, health services and town centres.’

2.2 At pre-submission stage, Landform noted that some allocated housing sites included in the Draft Local Plan specifically require provision of sheltered and/or extra care housing. However, no actual numbers are apportioned to each of these sites. In order to ensure enough sheltered and extra care homes are provided, the draft policy recognises that some of this need will be met through windfall sites. However, Landform raise concern with the general approach to allocating accommodation for older people and in responding to Question 2.5, a technical note has been prepared by Barton Willmore Development Economics Team included at Appendix 1 which addresses the following:

- The Council’s evidence of older persons needs at a strategic housing market area;
- Reference to PPG raising concerns over the lack of policy relating to older persons accommodation needs;
- Settlement specific housing needs – drawing population profile of Martlesham;
- Age profile analysis;
- Tenure profile;
- Supply of older specialist Housing Accommodation; and
- Localised assessment of need for specialist older persons accommodation.

2.3 The Draft Local Plan seeks to provide 10,476 new homes over the course of the Plan (date). Analysis of the level of population and household growth within the Martlesham and surrounding settlements confirms growth of 2,030 households over the period 2018-2036, which represents 30% of equivalent household growth across the District. On this basis, it is possible to apportion the draft housing requirement to this local area, equating to a need for 3,140 new homes.

2.4 Table 3.5 of the Draft Local Plan demonstrates that the Council is planning for an indicative contribution to housing delivery from settlements within this same study area totalling 3,039 new homes. Whilst this falls slightly short of the locally derived housing requirement (3,140), it is apparent that the Council has included the full delivery of 2,000 dwellings at Brightwell Lakes (Policy SCLP12.19 Brightwell Lakes) within its calculations, placing a heavy reliance on this site to meet the needs of the local population. Brightwell Lakes is considered under Matter 3.
2.5 It is clear that a significant proportion of population growth relates to the older population, a point recognised by the Council in its Draft Local Plan. The Vision seeks to ensure that the needs of older people are addressed, a point also acknowledged by Central Government, who through the PPG have cited the need to provide housing for older people as critical.

2.6 Despite this, the Draft Local Plan does not include a specific policy relating to the specialist accommodation needs of older people. Instead the Council has drawn upon its Strategic Housing Market Assessment (SHMA) evidence to refer to the identified need within text accompanying its housing mix policy. This policy seeks simply to require that proposals of 10 or more dwellings demonstrate how a proposal contributes to increasing the choice and mix of housing available for older people. However, such an approach fails to acknowledge the requirements of such specialist accommodation providers in so far as they are dependent on building at scale in order to provider associated on-site facilities. As an example, it is unrealistic to expect 11 dwelling developments to contribute towards elderly accommodation. In short, the proposed policy response is not effective in meeting the identified need.

2.7 In this context it is worth noting the conclusions in a recent appeal APP/A0665/W/18/3203413 (Beechmoor Garden Centre, Whitchurch Road, Great Boughton, Chester CH3 5QD) dated 17 July 2019. At paragraph 43, the Inspector states “I have some concerns about the assessment. While there is likely to be a minimum site size that could accommodate an extra care development, there is little evidence that the appellant has been particularly flexible in their approach to scale or in terms of the types of location considered viable for delivery. Moreover, how much thought has gone into the likelihood of planning issues being able to be mitigated is unclear. Nevertheless, the Council has not been able to provide evidence of suitable sites for the development, nor has it demonstrated that similar developments are coming forward as windfalls.”

2.8 Furthermore, whilst the SHMA identifies a need for older people’s accommodation it fails to consider existing levels of under delivery, which once taken into account significantly increases the level of accommodation required to **5,486 units** within the District. Of this figure some 846 extra care leasehold units are required (current supply restricted to social rent).

2.9 Within the locality of Martlesham it is determined that there exists a requirement for **1,446 units**, of which 243 are extra care leasehold. These figures highlight the significance which should be placed on the delivery of specialist older people’s accommodation in the Draft Plan, and also the benefits that can result in freeing up family homes, given existing levels of owner occupation, and under occupancy within those aged 65+.

2.10 If the identified demand is to be met, new sites for older people’s accommodation will need to be allocated in the Draft Local Plan. Land at Felixstowe Road, Martlesham is an ideal opportunity for extra care leasehold units and Landform is working with Retirement Villages to develop proposals. A typically Retirement Villages development contains 80-90 units (plus on-site facilities such as a shop and surgery), meaning three individual developments within the 10-minute drive time catchment are required to meet the just the extra care leasehold element.
Conclusion

2.11 In conclusion, there is a clear and immediate requirement for specialist older people’s accommodation within Martlesham, and given the local demography, draft Local Plan Vision, and focus by Central Government, the draft Local Plan should place a greater emphasis on the focused delivery of such accommodation. In addressing this shortcoming, the draft Local Plan should be amended to include the following:

1. Additional allocations for 1,446 units to meet the local shortfall (including extra care leasehold units);
2. A monitoring mechanism to ensure delivery meets forecast need; and,
3. Identification of reserve sites to come forward in the event strategic development sites are delayed.

BARTON WILLMORE
1 August 2019
Appendix 1
Development Economics – Housing Technical Paper
Housing Technical Paper

1.0 INTRODUCTION

1.1 This technical note has been prepared by Barton Willmore on behalf of Landform Martlesham Ltd in order to establish the level of population and household growth in Martlesham, as well as the level need which exists for specialist older people’s accommodation, and the wider benefits of such provision to the wider housing market.

1.2 This note builds upon the Council’s own evidence in respect of older peoples accommodation needs as set out in the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Volume 2 (published in 2017), which pre dates more recent Government Planning Practice Guidance relating to Housing and Economic Needs Assessments\(^1\), as well as the newly issued guidance relating to ‘Housing for Older and Disabled People’ (June 2019), and ‘Housing Needs of Different Groups’ (July 2019). Indeed, the importance placed by Government on planning for the housing needs of older people is emphasised in the first paragraph of the ‘Housing for Older and Disabled People’ guidance, where it states that ‘the need to provide housing for older people is critical’.

1.3 This note focuses on the District and local Martlesham area need for specialist older peoples housing, demonstrating that:

   a. The Local Plan evidence base significantly underestimates the need specialist housing for older people. Full need is four times greater that assessed by the SHMA, including a need for extra care housing that is nearly six times greater than assessed.

   b. Martlesham is a sizeable settlement that will account for 30% of Suffolk Coastal household growth and give rise to a need for at least 1,446 specialist housing units for the older people over the plan period; including 243 leasehold extra care units (there is no such provision in Martlesham at present).

   c. The Local Plan assumes that housing developments of 10 or more dwellings will deliver specialist housing as part of their housing mix. In the absence of enabling policy, this is little more than wishful thinking. As such, the prospect that such sites will offer deliverable opportunities for specialist housing development is questionable and unproven.

\(^{1}\) Paragraph 011, Identifying the need for different types of housing, February 2019
2.0 SUFFOLK COASTAL DRAFT LOCAL PLAN POLICY RELATING TO HOUSING FOR OLDER PEOPLE

2.1 In setting out the social context of the Plan, the Council recognise in paragraph 1.5 that Suffolk Coastal has one of the oldest populations of any district in the Country, and that this characteristic places additional requirements on the Local Plan. It goes on to state that an ageing population creates specific requirements for residential dwellings and care provision, and that the provision of new accommodation suitable for older people will potentially free up larger family housing – which it considers will be important alongside new dwellings.

2.2 The Council’s Vision (2018 – 2036) states that ‘The need for properties targeted at younger people and to meet the needs of older people will have been addressed, as well as the provision of homes to support people moving into the District.’

2.3 Text accompanying the Council’s housing mix policy highlights that the SHMA confirms an increase of 57.8% in the population aged 65+ across the Ipswich HMA between 2014 and 2036, and that the East Suffolk Housing Strategy recognises that there is an increasing number of older people living in housing that is too large or is not suited to their mobility needs. As such, it states that there is a need for more housing to be adopted to make it accessible and for more specialist housing for older people, confirming that the provision of smaller, more suitable, accommodation may result in more of the existing larger properties becoming available.

2.4 The proceeding paragraph references the SHMA’s assessment of need for specialist accommodation for older people, including sheltered housing, enhanced sheltered housing and extra care housing, which it considers to total 1,287 units by 2036. A table extract from the SHMA is set out at Table 2.1, confirming the suggested levels of need within each of the three specialist accommodation types.

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2 Paragraph 5.41, Final Draft Suffolk Coastal Local Plan
Table 2.1 SHMA Extract of Older Peoples Specialist Accommodation Need

<table>
<thead>
<tr>
<th>Type of specialist accommodation</th>
<th>Current profile</th>
<th>Profile 2036</th>
<th>Additional units required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheltered housing</td>
<td>1,321</td>
<td>2,307</td>
<td>986</td>
</tr>
<tr>
<td>Enhanced sheltered housing</td>
<td>41</td>
<td>144</td>
<td>103</td>
</tr>
<tr>
<td>Extracare housing</td>
<td>140.0</td>
<td>346</td>
<td>198</td>
</tr>
<tr>
<td>Total</td>
<td><strong>1,510</strong></td>
<td><strong>2,797</strong></td>
<td><strong>1,287</strong></td>
</tr>
</tbody>
</table>

Source: The Ipswich and Waveney Housing Market Areas SHMA, Volume 2 – September 2017

2.5 The paragraph goes on to state that provision for sheltered and extra care housing will be secured through larger residential allocations where feasible, as part of a mix of housing types. This is reiterated in Policy SCLP5.8: Housing Mix, which states that proposals of 10 unit or more will be required to demonstrate how the proposal contributes to increasing the choice and mix of housing available for the older population. It separately states that sheltered and extra care housing will be supported where the scheme incorporates a mix of tenures and sizes to meet an identified need.

2.6 Despite significant recognition within the Plan of the importance of providing for specialist older peoples accommodation across the District, in both meeting specific needs, but also in freeing up larger properties, the Plan does not provide a specific policy detailing the needs the Housing for Older People, and nor within the Housing Mix policy does it quantify that need.

2.7 In addressing how local planning authorities can monitor the number of homes for older and disabled people, the PPG\(^3\) states that plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. In addition to setting out how the plan-making authority will consider such proposals, it states that they should also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan-area throughout the plan period. The draft Plan clearly fails in this respect.

2.8 Furthermore, and despite the Housing Mix policy referring to the need for sheltered and extra care housing schemes to incorporate a mix of tenures, there is no evidence in the Council’s SHMA that any assessment of supply across tenures has been undertaken – as such the Council would appear to have no evidence of whether there is a relatively greater need within certain tenures. Indeed,

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\(^3\) PPG, 63-007-20190626
as we demonstrate below, the SHMA evidence also fails to assess whether the existing levels of sheltered and extra care provision are adequate to meet even the existing population, let alone future population growth requirements.

2.9 By way of context the Draft Local Plan seeks to provide for an additional 10,476 new homes over the Plan period, of which the Council anticipate new housing allocations within Martlesham Village to total 20 units (plus 56 permitted units).

3.0 COUNCIL’S ASSESSMENT OF NEED FOR SPECIALIST HOUSING FOR OLDER PEOPLE

3.1 The Ipswich Housing Market Area Strategic Housing Market Assessment Part 2 was published in August 2017 and includes an assessment of the requirements of specific groups of the population, including those of older people. In assessing the accommodation needs of older people, the SHMA confirms that is utilised modelling produced by Suffolk County Council, derived from the Strategic Housing for Older People (SHOP) tool developed by the Housing Learning and Improvement Network. The SHMA notes that the tool is only driven by demographic change.

3.2 Table 6.2f of the SHMA confirms that there are estimated to be a total of 1,520 units in the base year (assumed to be 2014) in Suffolk Coastal, and that over the course of a 22 year period to 2036 there will be a requirement for an additional 1,287 units – providing for total provision of 2,797 units in 2036. Of this figure the SHMA considers there to be a need for 198 extra care units, 103 enhanced sheltered housing units and 986 sheltered housing units.

3.3 Whilst the Council has published a partial updated Volume 2 SHMA in January 2019, this did not include an update of the assessment of need for older people’s specialist accommodation.

3.4 Paragraph 63-004-20190626 of the Planning Practice Guidance details the evidence plan-makers consider when identifying the housing needs of older people, including estimates and projections of population by age. It also states that the future need for specialist accommodation for older people broken down by tenure and type may need to be assessed, listing SHOP as one source.

3.5 The Housing LIN (authors of the SHOP toolkit) published ‘Housing in Later Life’ in 2012, in addition to the SHOP Resource Pack (Section A, Paper A2) estimate the demand by form of provision per thousand 75+ population. We apply these rates (Step 4) in our own calculation of older people’s
accommodation need, summarised in Table 3.1 and using supply data sourced from the Elderly Accommodation Council (Q2 2019).

Table 3.1 – Barton Willmore Derived Assessment of Need for Older People’s Accommodation (Suffolk Coastal)

<table>
<thead>
<tr>
<th>Step 1: Current Provision</th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leashold</td>
<td>562</td>
<td>41</td>
<td>0</td>
<td>603</td>
</tr>
<tr>
<td>Rent</td>
<td>780</td>
<td>0</td>
<td>124</td>
<td>904</td>
</tr>
<tr>
<td>Total</td>
<td>1,342</td>
<td>41</td>
<td>124</td>
<td>1,507</td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>Step 2: Population aged 75+</th>
<th>Total (000's)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016 based SNPP</td>
<td>17</td>
</tr>
<tr>
<td>75+ 2018</td>
<td>29</td>
</tr>
<tr>
<td>75+ 2036</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Step 3: Current Provision per 1,000 Population 75+</th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leashold</td>
<td>34</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Rent</td>
<td>47</td>
<td>0</td>
<td>7</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Step 4: Benchmark Provision Rate Per 1,000 Population 75+</th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leashold</td>
<td>120</td>
<td>10</td>
<td>30</td>
</tr>
<tr>
<td>Rent</td>
<td>60</td>
<td>10</td>
<td>15</td>
</tr>
</tbody>
</table>

Source: Housing in Later Life, 2012 (Housing LIN)

<table>
<thead>
<tr>
<th>Step 5: Current Under Provision (Current provision less benchmark)</th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leashold</td>
<td>1,433</td>
<td>125</td>
<td>499</td>
<td>2,057</td>
</tr>
<tr>
<td>Rent</td>
<td>218</td>
<td>166</td>
<td>125</td>
<td>509</td>
</tr>
<tr>
<td>Total</td>
<td>1,651</td>
<td>292</td>
<td>624</td>
<td>2,567</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Step 6: Future Demand In 2036 (Based upon benchmark provision rates)</th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leashold</td>
<td>1,430</td>
<td>119</td>
<td>357</td>
<td>1,907</td>
</tr>
<tr>
<td>Rent</td>
<td>715</td>
<td>119</td>
<td>179</td>
<td>1,013</td>
</tr>
<tr>
<td>Total</td>
<td>0</td>
<td>238</td>
<td>536</td>
<td>2,919</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Step 7: Total Need (Underprovision plus Future Need)</th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leashold</td>
<td>2,863</td>
<td>244</td>
<td>856</td>
<td>3,964</td>
</tr>
<tr>
<td>Rent</td>
<td>933</td>
<td>285</td>
<td>304</td>
<td>1,522</td>
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<tr>
<td>Total</td>
<td>1,651</td>
<td>530</td>
<td>1,160</td>
<td>5,486</td>
</tr>
</tbody>
</table>

Source: EAC, Housing LIN, ONS 2014 based subnational population projections

Note: Age exclusive (a form of sheltered housing) subsumed within Sheltered
Table 3.1 details the steps taken in assessing the need for older people’s accommodation across Suffolk Coastal, with the first step being to establish existing supply.

Step 3 of the assessment demonstrates the current rate of provision using existing supply figures (similar to those reported in the SHMA). When compared to the benchmark provision rates published by Housing LIN and shown in Step 4 it is clear that there is a significant deficit in all forms of provision, with sheltered rent showing the least deficit.

Step 5 above seeks to establish the current extent of under provision (based upon achieving the benchmarks set by Housing LIN. This shows that for current provision to meet benchmark rates, Suffolk Coastal District would need to provide for +2,567 units – this represents current need.

Furthermore, Step 6 assesses the additional requirements associated with the growth in the population aged 75+ over the Plan period to 2036, calculating a need for a further +2,919 units. As detailed in Step 7, total need therefore equates to 5,486 units.

The figures above vary significantly from those published by the Council. The Council’s SHMA does not include a sufficiently detailed methodology or listed assumptions to interrogate the results, but it is considered that the Council has simply applied its existing rates of provision to a growing population, rather than also seeking to address an existing under provision. We conclude this because the level of need relative to supply within the Council’s SHMA is similar to the level of population growth in those aged 75+.

There is however a fundamental flaw in undertaking this approach as it ‘bakes in’ any existing level of underprovision. To put the existing level of underprovision into context, at present the current supply of specialist older people’s accommodation equates to a rate of 91 units per 1,000 people aged 75+ living within Suffolk Coastal District – whereas the benchmark rate recommended by Housing LIN totals 245 units per 1,000 people age 75+.

Furthermore, the Council’s assessment takes no account of the tenure of the existing supply of specialist older people’s accommodation, or the tenure of future requirements. This is important as it is clear from our analysis that the majority (60%) of existing provision is within the social rented tenure, whilst 100% of extra care housing falls within this tenure. As we demonstrate below, this is critical to the analysis of need, as it highlights a potential mismatch between the tenure of current providers and that of the older population – who are largely owner occupiers.
As a result, current under provision and future need is weighted towards a need for private rent and leasehold units.

3.13 In summary therefore the need for older people’s accommodation would appear to be significantly greater than that assessed by Suffolk Coastal Council.

4.0 POPULATION PROFILE OF MARTLESHAM

4.1 As detailed above, the Council have failed to include a specific policy within its Plan relating to the accommodation needs of older people, and neither does it specify or indicate the preferred distribution of older people’s accommodation across the District.

4.2 We summarise below the population profile of Martlesham and surrounding settlements, both currently and projecting forward to 2036, demonstrating the settlements significant bias towards an older population.

4.3 For the purposes of this exercise we have adopted a Study Area comprising the four middle super output areas which encompass Martlesham, Kesgrove and Woodbridge amongst other settlements, as shown in the map presented at Figure 4.1.
4.4 Analysis of the age profile by 5 year age band is summarised in Figure 4.2 and Table 4.1, drawing upon Experian population projections (2014-based). This shows that within the Study Area, the population of younger age groups (below 59 years of age) will decline, with growth in all age groups aged 60+, emphasising the fact that the accommodation needs of older age groups to be properly catered for.
Figure 4.2 Martlesham Study Area Population Change 2018 - 2036

Source: Experian
Table 4.1 Martlesham Study Area Population Change 2018 - 2036

<table>
<thead>
<tr>
<th>Age</th>
<th>2018</th>
<th>2036</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-4</td>
<td>1,986</td>
<td>1,895</td>
<td>-5%</td>
</tr>
<tr>
<td>5-9</td>
<td>2,479</td>
<td>2,172</td>
<td>-12%</td>
</tr>
<tr>
<td>10-14</td>
<td>2,545</td>
<td>2,533</td>
<td>0%</td>
</tr>
<tr>
<td>15-19</td>
<td>2,287</td>
<td>2,242</td>
<td>-2%</td>
</tr>
<tr>
<td>20-24</td>
<td>1,402</td>
<td>1,471</td>
<td>5%</td>
</tr>
<tr>
<td>25-29</td>
<td>1,756</td>
<td>1,744</td>
<td>-1%</td>
</tr>
<tr>
<td>30-34</td>
<td>1,774</td>
<td>1,571</td>
<td>-11%</td>
</tr>
<tr>
<td>35-39</td>
<td>2,155</td>
<td>1,911</td>
<td>-11%</td>
</tr>
<tr>
<td>40-44</td>
<td>2,134</td>
<td>2,294</td>
<td>7%</td>
</tr>
<tr>
<td>45-49</td>
<td>2,637</td>
<td>2,396</td>
<td>-9%</td>
</tr>
<tr>
<td>50-54</td>
<td>2,813</td>
<td>2,348</td>
<td>-17%</td>
</tr>
<tr>
<td>55-59</td>
<td>2,396</td>
<td>2,320</td>
<td>-3%</td>
</tr>
<tr>
<td>60-64</td>
<td>2,256</td>
<td>2,470</td>
<td>9%</td>
</tr>
<tr>
<td>65-69</td>
<td>2,341</td>
<td>2,816</td>
<td>20%</td>
</tr>
<tr>
<td>70-74</td>
<td>2,712</td>
<td>2,871</td>
<td>6%</td>
</tr>
<tr>
<td>75-79</td>
<td>1,986</td>
<td>2,574</td>
<td>30%</td>
</tr>
<tr>
<td>80-84</td>
<td>1,591</td>
<td>2,146</td>
<td>35%</td>
</tr>
<tr>
<td>85+</td>
<td>1,641</td>
<td>3,380</td>
<td>106%</td>
</tr>
</tbody>
</table>

Source: Experian

4.5 Comparison with the growth in the population of broad age groups of Suffolk Coastal and the wider region is provided in Figure 4.3, further emphasising the disparity in the population change of older age groups versus the younger population.
Analysis of the 2011 Census provides data on the tenure of residents aged 65+ within the Study Area, and shows a clear distinction between the level of owner occupation (amounting to 86% of households where the household reference person is aged 65+), and other forms of tenure (see Table 4.2). This is critical in understanding whether the existing and future supply of specialist older people’s accommodation is attractive to existing residents within the locality. As we demonstrate within this Technical Note, all of the existing extra care provision within the Study Area is of a social rent tenure.
Table 4.2: Household reference person aged 65+ (Study Area)

<table>
<thead>
<tr>
<th>Tenure</th>
<th>Study Area</th>
<th>% Study Area</th>
<th>% Suffolk Coastal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owned</td>
<td>4,603</td>
<td>86%</td>
<td>81%</td>
</tr>
<tr>
<td>Shared ownership (part owned and part rented)</td>
<td>16</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Rented from council (Local Authority)</td>
<td>28</td>
<td>1%</td>
<td>1%</td>
</tr>
<tr>
<td>Other social rented</td>
<td>403</td>
<td>8%</td>
<td>11%</td>
</tr>
<tr>
<td>Private rented</td>
<td>214</td>
<td>4%</td>
<td>5%</td>
</tr>
<tr>
<td>Living rent free</td>
<td>71</td>
<td>1%</td>
<td>2%</td>
</tr>
</tbody>
</table>

Source: 2011 Census

4.7 Furthermore, analysis of occupancy rates by household across Suffolk Coastal District, demonstrates that of those household occupied by 65+ year olds, 94% of one person households, and 98% of families (over the age of 65) under occupy a home by one or more bedroom, with 57% and 72% respectively under occupying a home by 2 or more bedrooms (see Table 4.3). This highlights the extent of opportunity which exists to free up family homes through the provision of specialist older people’s accommodation.

Table 4.3: Occupancy Rating (bedrooms) by Household Composition 65+ (owned/shared ownership) – Suffolk Coastal

<table>
<thead>
<tr>
<th>Occupancy rating (bedrooms) of +2 or more</th>
<th>Occupancy rating (bedrooms) of +1</th>
<th>Occupancy rating (bedrooms) of 0</th>
<th>Occupancy rating (bedrooms) of -1 or less</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-person hh 65+</td>
<td>57%</td>
<td>37%</td>
<td>6%</td>
</tr>
<tr>
<td>1-family hh 65+</td>
<td>72%</td>
<td>26%</td>
<td>2%</td>
</tr>
</tbody>
</table>

Source: 2011 Census

4.8 Utilising 2014-based household projections (i.e. those underpinning the Government’s Standard Method for calculating housing need), Experian model household projections at a sub-district level. Table 4.4 summarises that estimate of household growth between 2018 and 2036 for the Study Area, totalling some 2,000 households. Note that this growth differs from the Standard Methodology calculation of housing need in so far as no account is made for affordability uplifts (+38% uplift within Suffolk Coastal), which will increase this figure further. It should also be noted that this figure simply reflects household growth based upon demographic change alone.
The figure for Suffolk Coastal is provided for comparison and demonstrates that household growth within the Study area amounts to 30% of household growth across the District.

4.9 On this basis it is reasonable to assume that the Council should be planning for 30% of its housing requirement within the Study area simply to meet demographic change – this amounts to 3,140 additional homes (i.e. 30% x 10,476).

Table 4.4: Experian (2014-Based Derived) Household Projections

<table>
<thead>
<tr>
<th>Year</th>
<th>Martlesham Study Area</th>
<th>Suffolk Coastal</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>16,271</td>
<td>56,464</td>
</tr>
<tr>
<td>2036</td>
<td>18,301</td>
<td>63,293</td>
</tr>
<tr>
<td>2018-2036</td>
<td>2,030</td>
<td>6,829</td>
</tr>
</tbody>
</table>

4.10 Furthermore and as detailed above, population growth within both the Study area and Suffolk Coastal in older age groups is significant suggesting that the supply of future housing should be geared towards meeting the needs of older people, and in doing so this will free up the supply of existing family homes to the wider housing market.

5.0 SUPPLY OF OLDER PERSONS SPECIALIST HOUSING ACCOMMODATION WITHIN AND SURROUNDING MARTLESHAM

5.1 Drawing upon Elderly Accommodation Council data we have assessed the provision of older persons accommodation within the Study Area, and surrounds. For the purposes of this exercise we have also mapped a 5, 10 and 15 minutes drivetime isochrone around the site, as shown in Figure 5.1.
5.2 Table 5.1 summarise the extent of current supply by form of provision.

**Table 5.1: Current Supply Within Study Area**

<table>
<thead>
<tr>
<th>Study Area</th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>213</td>
<td>41</td>
<td>0</td>
<td>254</td>
</tr>
<tr>
<td>Rent (market)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rent (social)</td>
<td>193</td>
<td>0</td>
<td>92</td>
<td>285</td>
</tr>
<tr>
<td>Total</td>
<td>406</td>
<td>41</td>
<td>92</td>
<td>539</td>
</tr>
</tbody>
</table>
5.3 Within Martlesham and surrounding settlements (including Kesgrave and Woodbridge) current supply is biased towards sheltered housing, with limited extra care provision. Of particular note is that there is no leasehold extra care provision within the Study Area, and of the current rented stock, all is social rent.

**Table 5.2: Current Supply Within 5 Minute Drivetime**

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>39</td>
<td>0</td>
<td>0</td>
<td>39</td>
</tr>
<tr>
<td>Rent (market)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rent (social)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>39</td>
<td>0</td>
<td>0</td>
<td>39</td>
</tr>
</tbody>
</table>

5.4 Within Martlesham Heath, supply is limited to one sheltered housing scheme (Bader Court), a leasehold scheme comprising 39 units. Bader Court opened in 1987.

**Table 5.3: Current Supply Within 10 Minute Drivetime**

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>242</td>
<td>41</td>
<td>0</td>
<td>283</td>
</tr>
<tr>
<td>Rent (market)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rent (social)</td>
<td>188</td>
<td>0</td>
<td>92</td>
<td>280</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>430</td>
<td>41</td>
<td>92</td>
<td>563</td>
</tr>
</tbody>
</table>

5.5 Supply within 10 minutes of Martlesham (Table 5.3) broadly mirrors that of the Study Area, with no leasehold extra care provision.

**Table 5.4: Current Supply Within 15 Minute Drivetime**

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>276</td>
<td>41</td>
<td>0</td>
<td>317</td>
</tr>
<tr>
<td>Rent (market)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Rent (social)</td>
<td>521</td>
<td>0</td>
<td>100</td>
<td>621</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>797</td>
<td>41</td>
<td>100</td>
<td>938</td>
</tr>
</tbody>
</table>
5.6 Within a 15 minute drivetime, whilst the level of supply increases, particularly in social rent tenure sheltered housing, there is clear lack of extra care provision, with no leasehold providers operating in the vicinity (see Table 5.4).

6.0 SETTLEMENT LEVEL ASSESSMENT OF NEED FOR SPECIALIST OLDER PEOPLES HOUSING IN MARTLESHAM

6.1 Given the apparent lack of specialist older people’s accommodation within the locality of Martlesham, we have sought to establish the need (due to both unmet need and future demographic change) within and surrounding Martlesham. For the purposes of this exercise we have sought to establish the need for specialist older people’s accommodation within the Martlesham Study Area (see Table 6.1).

6.2 Following the same methodology as detailed earlier within this Technical Note the following tables seek to establish the need for specialist older people’s accommodation of various forms within the locality of Martlesham. At present, current supply equates to 103 units per 1,000 of population aged 75+, which whilst exceeding that of the wider District, is less than half that of the benchmark need identified by Housing LIN. As detailed in Step 5 below in order to correct this deficit there exists an immediate requirement for 739 units, of which 157 units of this requirement falls within leasehold extra care for which there is currently no provision locally.

6.3 Furthermore, and after account for future population growth there will exist an additional requirement for 706 units of all forms, resulting in a total requirement for 1,446 units (+243 units of leasehold extra care).

6.4 This level of need for specialist older peoples accommodation within the locality of Martlesham, compares with our earlier calculation of the proportionate housing requirement for the same area totalling 3,140 units, which serves to demonstrate the importance that should be placed on the delivery of specialist accommodation, and the role that it can play in freeing up family homes within the wider housing market.
Table 6.1 – Barton Willmore Derived Assessment of Need for Older People’s Accommodation (Martlesham Study Area)

<table>
<thead>
<tr>
<th>Study Area - Martlesham</th>
</tr>
</thead>
</table>

### Step 1: Current Provision

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>213</td>
<td>41</td>
<td>0</td>
<td>254</td>
</tr>
<tr>
<td>Rent</td>
<td>193</td>
<td>0</td>
<td>92</td>
<td>285</td>
</tr>
<tr>
<td>Total</td>
<td>406</td>
<td>41</td>
<td>92</td>
<td>539</td>
</tr>
</tbody>
</table>

### Step 2: Population aged 75+

<table>
<thead>
<tr>
<th></th>
<th>Experian</th>
<th>Total (000's)</th>
</tr>
</thead>
<tbody>
<tr>
<td>75+ 2017</td>
<td>2017</td>
<td>5</td>
</tr>
<tr>
<td>75+ 2036</td>
<td>2036</td>
<td>8</td>
</tr>
</tbody>
</table>

### Step 3: Current Provision per 1,000 Population 75+

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>41</td>
<td>8</td>
<td>0</td>
</tr>
<tr>
<td>Rent</td>
<td>37</td>
<td>0</td>
<td>18</td>
</tr>
</tbody>
</table>

### Step 4: Benchmark Provision Rate Per 1,000 Population 75+

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>120</td>
<td>10</td>
<td>30</td>
</tr>
<tr>
<td>Rent</td>
<td>60</td>
<td>10</td>
<td>15</td>
</tr>
</tbody>
</table>

Source: Housing in Later Life, 2012 (Housing LIN)

### Step 5: Current Under Provision (Current provision less benchmark)

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>413</td>
<td>11</td>
<td>157</td>
<td>581</td>
</tr>
<tr>
<td>Rent</td>
<td>120</td>
<td>52</td>
<td>-14</td>
<td>159</td>
</tr>
<tr>
<td>Total</td>
<td>533</td>
<td>63</td>
<td>143</td>
<td>739</td>
</tr>
</tbody>
</table>

### Step 6: Future Demand In 2036 (Based upon benchmark provision rates)

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>346</td>
<td>29</td>
<td>86</td>
<td>461</td>
</tr>
<tr>
<td>Rent</td>
<td>173</td>
<td>29</td>
<td>43</td>
<td>245</td>
</tr>
<tr>
<td>Total</td>
<td>519</td>
<td>58</td>
<td>130</td>
<td>706</td>
</tr>
</tbody>
</table>

### Step 7: Total Need (Underprovision plus Future Need)

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Enhanced Sheltered</th>
<th>Extra Care</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leasehold</td>
<td>759</td>
<td>40</td>
<td>243</td>
<td>1,042</td>
</tr>
<tr>
<td>Rent</td>
<td>293</td>
<td>81</td>
<td>30</td>
<td>404</td>
</tr>
<tr>
<td>Total</td>
<td>1,052</td>
<td>121</td>
<td>273</td>
<td>1,446</td>
</tr>
</tbody>
</table>

Source: EAC, Housing LIN, ONS 2014 based subnational population projections

Note: Age exclusive (a form of sheltered housing) subsumed within Sheltered
7.0 SUMMARY AND CONCLUSION

7.1 In summary this technical note has been prepared by Barton Willmore in order to establish the level of population and household growth in Martlesham, as well as the level need which exists for specialist older people’s accommodation, and the wider benefits of such provision to the wider housing market.

7.2 The Draft Local Plan seeks to provide 10,476 new homes over the course of the Plan. Our analysis of the level of population and household growth within the Martlesham and surrounding settlements (derived from Experian and underpinned by 2014-based projections) confirms growth (based on demographic change) of 2,030 households over the period 2018-2036, which represents 30% of equivalent household growth across the District. On this basis it is possible to apportion the draft housing requirement to this local area, equating to a need for 3,140 new homes.

7.3 It is apparent from Table 3.5 of the Draft Local plan that the Council is planning for an indicative contribution to housing delivery from settlements within this same study area totalling 3,039 new homes. Whilst this falls slightly short of the locally derived housing requirement (3,140), it is apparent that the Council has included the full delivery of 2,000 dwellings at Brightwell Lakes within its calculations, placing a heavy reliance on Brightwell Lakes to meet the needs of the local population.

7.4 Furthermore, it is clear that a significant proportion of population growth within the Study Area relates to the older population, a point recognised by the Council in its Draft Plan. The Draft Plan’s Vision seeks to ensure that the needs of older people are addressed, a point also acknowledged by Central Government, who within Planning Practice Guidance have cited the need to provide housing for older people as critical.

7.5 Despite this the Draft Local Plan does not include a specific policy relating to the specialist accommodation needs of older people. Instead the Council has drawn upon its SHMA evidence to refer to the identified need within text accompanying its housing mix policy. This policy seeks simply to require that proposals of 10 or more dwellings demonstrate how a proposal contributes to increasing the choice and mix of housing available for older people. However, such an approach fails to acknowledge the requirements of such specialist accommodation providers in so far as they are dependant on building at scale in order to provider associated on-site facilities.
7.6 Furthermore, whilst the SHMA identifies a need for older people’s accommodation it would appear to fail to consider existing levels of under delivery, which once taken into account significantly increases the level of accommodation required to 5,486 units within the District. Of this figure some 846 extra care leasehold units are required (noting that current supply is restricted to social rent).

7.7 Within the locality of Martlesham it is determined that there exists a requirement for 1,446 units, of which 243 are extra care leasehold.

7.8 These figures highlight the significance which should be placed on the delivery of specialist older people’s accommodation in the Draft Plan, and also the benefits that can result in freeing up family homes, given existing levels of owner occupation, and under occupancy within those aged 65+.

7.9 In conclusion there is a clear immediate requirement for specialist older people’s accommodation within Martlesham, and the wider district, and given the local demography, draft Local Plan Vision, and focus by Central Government, the draft Local Plan should place a greater emphasis on the focused delivery of such accommodation.