Suffolk Coastal Local Plan Examination

Note on Housing for Older People

1. This note responds to the Inspector’s post hearings letter, dated 31 January 2020.

2. In relation to Housing for Older People, the Inspector’s letter invites the Council to:

   • Put forward modifications to the Plan to state the number of units of specialist housing required for older people for the plan period;

   • Put forward modifications to the Plan to clarify what it is seeking to deliver in terms of housing for older people. Following clarification sought by the Council, the Inspector has stated that the Council should consider setting out in broad terms the level of housing for older people the Plan is seeking to provide through allocations and the implementation of its policies;

   • Put forward modifications to policies SCLP5.8 Housing Mix, SCLP5.10 Affordable Housing on Residential Developments and SCLP5.11 Affordable Housing on Exception Sites to address the housing needs of older people.

3. These are each considered in turn below. The Planning Practice Guidance on Housing for Older and Disabled People 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. These policies can set out how the plan-making authority will consider proposals for different types of housing that these groups are likely to require. They could 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.” (Paragraph: 006 Reference ID: 63-006-20190626).

4. For all modifications set out in this note, these are shown in strikethrough for deleted text and in underline for additional text. The Council will include these revisions in the schedule of modifications that has been collated as part of the Examination.

   Modifications to the Plan to state the number of units of specialist housing required for older people for the plan period

5. Paragraph 5.42 of the Final Draft Local Plan (Document A1, page 92) sets out the total need for specialist housing over the plan period as 1,287 dwellings (including sheltered housing, enhanced sheltered housing and extra care housing) and a need for 1,118 spaces in Registered Care (nursing and residential care homes).
6. The Council’s Note on Specialist Housing, produced following the hearing session on Matter 2A Housing Provision, sets out the net needs for specialist accommodation for older people over the period 2016 – 2036 (Document I8), disaggregated between market and affordable needs. The Note shows that the majority of older person households will require general housing, however does also identify needs for specialist housing. Further, many older people will wish to remain in their own home rather than move to specialist accommodation, and this is acknowledged by the Planning Practice Guidance which states that “Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment.” (Planning Practice Guidance – Housing for Older and Disabled People, Document C2, Paragraph: 012 Reference ID: 63-012-20190626).

7. To address the Inspector’s letter, the Council proposes the modifications below to set out the number of units of specialist housing required for older people over the plan period.

Modifications to Paragraph 5.42:

“The SHMA includes an assessment of the needs for specialist accommodation for older people (sheltered housing, enhanced sheltered housing and extra care housing) and identifies a need for a total of 1,287 units by 2036. The SHMA also identifies a need for a further 1,118 spaces in Registered Care (nursing and residential care homes) over the plan period. These needs are set out in Table 5.3 below, and have been further disaggregated between market and affordable needs.

**Table 5.3: Net need for specialist accommodation in Suffolk Coastal (2016 – 2036)**

<table>
<thead>
<tr>
<th></th>
<th>Market</th>
<th></th>
<th>Affordable</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Residential care</td>
<td>Sheltered housing</td>
<td>Enhanced sheltered/ Extra care housing</td>
<td>Residential care</td>
</tr>
<tr>
<td>Number of units</td>
<td>694</td>
<td>891</td>
<td>247</td>
<td>424</td>
</tr>
</tbody>
</table>

Traditional forms of provision may not always match modern demands and although the specialist housing market sector addresses a wide variety of needs it is considered that some of this need will be met through the provision of non-specialist housing, and therefore it is important that the mix of housing helps to address these needs. Provision for sheltered and extra care housing and registered care will be secured through larger residential allocations where feasible, as part of a mix of housing types.”

*Note that figures may not sum due to rounding*
Modifications to the Plan to clarify what it is seeking to deliver in terms of housing for older people

8. As set out in the Council’s Note on Specialist Housing (Document I8, page 3) the Local Plan has been prepared with a view to positively addressing the issues presented by the increasing elderly population in the Suffolk Coastal area. A number of ways in which the Plan does this are set out in that Note.

9. The Council would support further modifications as set out below to clarify the ways in which the Plan is seeking to address the housing needs of older people.

Addition of new paragraphs after paragraph 5.41:

“The Local Plan seeks to address the housing needs of older people in a number of ways. Whilst the unrestricted existing housing stock, in practice, forms part of the supply of future housing for older people the Plan recognises that due to the increasingly ageing population there is a need to ensure that new development provides for housing that will more specifically meet the needs for accommodation for older people. By 2036 it is projected that there will be 40,916 older person households (gross) in the Suffolk Coastal area. The types of accommodation needed for older person households, derived from the Long Term Balancing housing Markets model and Strategic Housing for Older People tool as referenced in the SHMA, are set out in Table 5.2 below. It is evident that the majority of older people will require general housing.

Table 5.2: Type of accommodation required for older person only households in Suffolk Coastal in 2036 (gross)

<table>
<thead>
<tr>
<th>Size of home</th>
<th>Market General housing</th>
<th>Market Sheltered housing</th>
<th>Market Enhanced sheltered/ Extra care housing</th>
<th>Affordable General housing</th>
<th>Affordable Sheltered housing</th>
<th>Affordable Enhanced sheltered/ Extra care housing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 bedroom</td>
<td>3,163</td>
<td>1,269</td>
<td>253</td>
<td>1,953</td>
<td>749</td>
<td>216</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>8,177</td>
<td>224</td>
<td>17</td>
<td>2,453</td>
<td>65</td>
<td>4</td>
</tr>
<tr>
<td>3 bedrooms</td>
<td>15,690</td>
<td>-</td>
<td>-</td>
<td>501</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>4+ bedrooms</td>
<td>3,817</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total in households</td>
<td>30,847</td>
<td>1,493</td>
<td>270</td>
<td>4,907</td>
<td>814</td>
<td>220</td>
</tr>
<tr>
<td>Residential care</td>
<td>1,618</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 5.2: Type of accommodation required for older person only households in Suffolk Coastal in 2036 (gross)
In reflection of the extent of need for older persons accommodation, Policy SCLP5.8 references that housing development over the plan period will contribute to the significant need for accommodation for older people and that all housing development of ten or more dwellings should demonstrate how it will contribute to meeting the needs of older people. It is acknowledged that on smaller sites (below 50 dwellings) the provision of specialist accommodation (sheltered and extra care) is less likely to be feasible and the Council would therefore expect that the needs for older persons housing to be addressed through provision of M4(2) and M4(3) housing and other forms of housing as set out in paragraph 5.44, as part of the housing mix. On larger sites (of 50 or more dwellings) the Council would expect that, in meeting this policy requirement, consideration is given to needs for specialist housing and that this is addressed where feasible.

Reflecting the opportunities provided by sites to deliver on the wider objectives set out in paragraph 5.45, a number of site allocations within the Local Plan contain a policy criteria specifying that the mix of housing provided should include housing to meet the needs of older people. It is expected that development coming forward on these allocations would, as an integral part of the development, include housing such as the types set out in paragraph 5.44 below and on larger allocations would consider and address needs for specialist accommodation where feasible as part of meeting this requirement.

The allocations which contain a specific requirement to include housing to meet the needs of older people are:

SCLP12.3 North Felixstowe Garden Neighbourhood

SCLP12.4 Land North of Conway Close and Swallow Close, Felixstowe (includes a specific reference to bungalows)

SCLP12.5 Land at Brackenbury Sports Centre

SCLP12.29 South Saxmundham Garden Neighbourhood

SCLP12.33 Land at Woodbridge Town Football Club

SCLP12.44 Land South of Forge Close between Main Road and Ayden, Benhall

SCLP12.47 Land behind 15 St Peters Close, Charsfield (includes a specific reference to bungalows)

SCLP12.50: Land off Laxfield Road, Dennington

SCLP12.51: Land to the South of Eyke CoE Primary School and East of the Street, Eyke

SCLP12.52: Land to the West of Chapel Road, Grundisburgh

SCLP12.58: Land North of Mill Close, Orford (includes specific reference to bungalows)
SCLP12.59: Land adjacent to Swiss Farm, Otley

SCLP12.61: Land between High Street and Chapel Lane, Pettistree

SCLP12.66: Land adjacent to Reeve Lodge, High Road, Trimley St Martin

SCLP12.69 Land West of B1125, Westleton”

Addition of new text at the end of paragraph 5.42:

“It is expected that the two Garden Neighbourhoods, which form a central part of the strategy of the Local Plan, will deliver an element of specialist housing through reference in the policies to the provision of housing to meet the needs of vulnerable people. Land is also allocated under Policy SCLP12.27 Land rear of Rose Hill, Aldeburgh for the development of a care home alongside residential dwellings. Policy SCLP5.8 supports the provision of sheltered and extra care housing where this incorporates a mix of tenures to meet an identified need. Policy SCLP5.11 Affordable Housing on Exception Sites also provides opportunities for the delivery of affordable specialist accommodation on sites outside of but adjacent or well related to Settlement Boundaries.”

Modification to paragraph 5.44:

“In addition to specialist accommodation, there is a range of types of housing that may be particularly well suited to the older population, but which may also help to improve choice in the housing stock across the District more generally. The Council will support innovative schemes which seek to create integrated communities and will expect developers to consider whether such types of housing would be feasible depending on the site size and location. Examples of housing types and design which may contribute to providing a mix of housing choices for older people could include those set out below, however it is not the intention that these would routinely be limited to occupation by older people and they may also suit the needs of others. Types of housing which could be suitable for older people include:

- Almshouses – housing provided by charities at a low rent, usually for older people;
- Cohousing – community led schemes whereby residents share some spaces / facilities;
- Bungalows/level access homes, including dormer bungalows provided there is adequate living accommodation (i.e. bedroom(s) and bathroom(s)) on the ground floor;
- Smaller properties, but which have larger than standard living and storage space;
- Provision of shared or smaller garden/outdoor spaces.”
Modifications to policies SCLP5.8 Housing Mix, SCLP5.10 Affordable Housing on Residential
Developments and SCLP5.11 Affordable Housing on Exception Sites

10. Paragraph 61 of the National Planning Policy Framework states that the size, type and
tenure of housing needed for different groups in the community should be reflected in
planning policies. Modifications are set out above to the supporting text to Policy SCLP5.8 to
clarify the needs for housing for older people. In response to the Inspector’s letter the
Council therefore proposes the modifications to the policies below:

Addition of new sentence at the start of Policy SCLP5.8 Housing Mix:

“Proposals for new housing development will be expected to deliver the housing needed for
different groups in the community as identified in the Strategic Housing Market Assessment,
or equivalent future assessment.”

Add new sentence within Policy SCLP5.8 Housing Mix:

“To contribute towards meeting the significant needs for housing for older people,
proposals for ten or more dwellings should demonstrate how the development will
contribute to meeting the needs of older people.”

Modification to first sentence within Policy SCLP5.10 Affordable Housing in Residential
Developments:

“Proposals for residential development with capacity for ten units or more or sites of 0.5ha
or more will be expected to make provision for 1 in 3 units to be affordable dwellings, and
to be made available to meet an identified local need, including needs for affordable
housing for older people.”

Modification to criterion c) of policy SCLP5.11 Affordable Housing on Exception Sites:

“The scheme incorporates a range of dwelling sizes, types and tenures appropriate to the
identified local need, including needs for affordable housing for older people; and”

Note – the full text of Policy SCLP5.8 including supporting text showing all proposed modifications is
also provided as a separate document for clarity.