EXAMINATION IN PUBLIC OF THE RUNNYMEDE 2030 LOCAL PLAN
HEARING STATEMENT
25 January 2019

MATTER 8
ELYSIAN RESIDENCES
REPRESENTOR 2006

8.1 Is the Plan based on robust evidence about the housing land supply for the period up to 2030? In particular:

   a) Is the estimated supply from extant planning permissions, windfalls and prior approvals justified and based on reasonable assumptions? Does the methodology avoid the risk of double-counting? Is the approach to lapse rates for planning permissions robust? Should lapse rates be applied to site allocations?

2. The figures contained in the Local Plan are overly ambitious and do not take full account of the inevitability of there being a dwindling supply of land for housing delivery over the plan period. The OAN for Runnymede requires a level of housing delivery which is considerably in excess of historic performance and, as such, it is our position that very conservative estimates of site capacity should be allowed for in the plan to account of the evidence regarding difficulties in delivering significant numbers of new homes in the borough.

3. The submission Local Plan states at para 5.9:
   ‘Given, however, the significant level of housing need which exists in the Borough, as evidenced through the Runnymede-Spelthorne Strategic Housing Market Assessment (SHMA), it is evident that there needs to be a step change in housing delivery in Runnymede.’

4. However, even given the ambition to increase density on identified sites it is our position that the estimated supply of housing from identified sources is overly ambitious. The delivery of housing over the five Local Plan monitoring periods to 2018/19 amounted to 278 dwellings per annum against a target of 535 dwellings per annum.

5. The SLAA states at paragraph 32:
   ‘The information contained in Appendix 4 suggests that the under-delivery discount figure applied in the interim SLAA housing trajectory of 20% was a little cautious and therefore, an average figure of 15% based on local data is considered more accurate and realistic. This figure is applied to sites that do not benefit from planning permission, or do have planning permission but have not started.’

6. It is our position that the allowance of 20% should be made, given the nature of the sites in question and the extent of housing delivery that is required against historic performance in Runnymede. Furthermore, there will be an inevitable reduction in the availability of windfall sites overtime.
7. The approach to housing yields from windfall sites and prior approvals only takes account of diminishing marginal yields from these sources beyond year 5 of the plan. It is our position that the delivery forecasts from these sources should be adjusted from year 1 to allow for the potential for under delivery from these sources from the outset. It is unrealistic to forecast 100% success from these sources in the early years of the plan.

8. It would be prudent to allow lapse rates for allocations as well as extant permissions and windfall sites. In certain situations, development sites do not come forward for a variety of reasons such as market conditions, technical issues and the circumstances of landowners. Therefore, it is reasonable to make some adjustment to allow for under delivery from allocations.

9. Judged against the soundness criteria, therefore, our submission is, for the reasons set out above and elaborated also below, that the submitted Plan is not positively prepared, justified, likely to be effective or consistent with Government policy, specifically the aspiration for a significant boost in the supply of housing and for the meeting of needs of all sectors of the population including the elderly. In order to make the Plan sound, the housing supply must reflect a 20% buffer and the overall allocation of housing must be increased by the addition of new sites including, importantly, provision for specialist housing to meet the needs of older people, those who are in this age bracket already and those who will reach that stage of their lives during the Plan period.

b) Is there a sound basis for the expected contribution from Class C2 older people’s accommodation to the Class C3 housing supply?

10. The response to this question is closely linked to the representations made in relation to question 7.9 (see Appendix 1 to this statement): the basis on which the Authority projects the future need for C2 accommodation for older people is flawed and leads to a very substantial under estimate of what will be required. The future need suggested by the 2018 Update of the SHMA is already exceeded by approved schemes in the pipeline. Unless the Authority re-calculates the need for C2 accommodation for older people to achieve a more rational outcome there will be no basis for bringing forward further units to meet projected need and to be counted against delivery targets.

11. Moving beyond those units already approved the Authority may seek to rely on allocation of a large development site (Longcross Garden Village) to make up the numbers but that offers no guarantee as to whether the C2 provision eventually proposed will be appropriate to emerging need, or even if it will form part of eventual development at all. Experience suggests that volume general housing developers, having secured the site, may prefer to build out more profitable house types than those that would comprise an Extra Care scheme.

12. The resistance of the authority to contemporary, flexible and attractive models of C2 provision that will appeal to that majority of its older citizens who are home owners gives no confidence that they can deliver an adequate supply. They have not identified an adequate supply sites to be allocated for this purpose and routinely resist planning applications for developments that would address this need.

13. It is not clear that the sites identified will accommodate the scale of developments required. These developments need to incorporate the features required to be attractive to the local market
among older home owners, and to meet their care needs sustainably. This requires sites of a size not readily available within the proposed allocations.

14. A C2 business model of the type provided by Elysian Residences is to provide continuing care in the residents’ apartments in communities that are well located close to public transport. Each apartment has over 20 features that allows it to change to a resident’s needs over time. To allow continuing care and health benefits to be provided to residents 10-15% of the total development areas is used for services, healthcare and communal operations such as nurses station, rooms for fitness and recreation, dining, healthcare etc. To support the cost of this space, the developments need to be of a certain scale, which is c. 100 units. It is these extras which provide the positive benefits of the form of housing provided and are proven to reduce healthcare costs of residents by c.35%.

15. Only two of the proposed site allocations (Chertsey Bittams Parcel D and Virginia Water North) indicate that C2 accommodation would be provided at the site, and at both of these sites this would be through retaining and upgrading existing facilities. Several of the sites (including SLAA ref. 254, 255, 261, and 263) are also located beyond a 15 minutes’ walk from public transportation so would not be suitable for the type of older persons’ accommodation set out above, and few of sites (seven of the 23 allocated) are at a scale large enough to accommodate the functions set out in paragraph 14 above (refer to Appendix 2 of our February 2018 representations which sets out the estimated site capacities of the allocated sites).

16. Taking these considerations together one can have little confidence that relevant C2 accommodation will be brought forward in sufficient volume to make any significant contribution to meeting targets unless the Authority radically re-appraises its approach to the need for C2 accommodation for older people within Runnymede.

c) Are the estimates of site capacities (for the site allocations/opportunity areas, SLAA sites and estates regeneration) robust, taking account of viability, infrastructure and any other delivery constraints?

17. The capacities of the sites allocated for housing within the Plan are overestimated. Please refer to Appendix 2 to our representations dated 22 February 2018 and Appendix 4 to our representations dated 29 June 2018, which provide detailed assessment of each of the sites and allocations and their shortcomings, as well as our Matter 6 statement.

d) Is it realistic to expect that the shortfall in delivery of the housing requirement from the start of the Plan period will be made up within five years of the Plan’s adoption? If not, how should the Plan address this matter?

18. Given the extent of housing to be delivered in the first five years of the plan it is unrealistic for the shortfall to be made up during this period. It is our contention that additional land should be allocated for delivery during the first five years and more conservative estimates of site capacity should be applied to those sites allocated. By allocating more land and taking a more cautious approach to site capacity the prospects for recovering the shortfall during the early part of the plan will be optimised.
e) Is it justified to add a 20% buffer to the housing land supply to guard against any under-delivery of sites?

19. It has been our position consistently that the 20% buffer as applied in previous drafts of the SHLAA should be carried forward to the housing trajectory. The 15% that has been applied to certain C3 sites is too cautious and needs to be increased to allow for the increasing difficulty of delivering housing units overtime.

8.2 Overall, is the most recent housing trajectory founded on credible evidence about the deliverability and achievability of the proposed development on the identified sites and other sources of supply within the expected timescales? Can there be reasonable confidence that a rolling 5-year supply of deliverable sites will be maintained from the date of the Plan’s adoption?

20. Our concerns with the identified housing trajectory and the methodology that underpins it are set out in Appendix 2 to our representations dates 22 February 2018. In summary:
   a) Paragraph 7 of the SLAA identifies that RBC has sought to contact the respective landowners regarding availability of land and the response has been ‘generally positive’. We remain concerned that there is little certainty as to whether these sites are available or deliverable, particularly in the light of the wider, unresolved highways issues (discussed further below) and such vagueness is not adequate to demonstrate soundness.
   b) Whilst prior approvals can contribute towards the overall housing supply, a capacity for the Brownfield Register sites without permission should not be assumed; rather an estimation of the overall prior approval rate (i.e. as per the windfall calculation) should be included.
   c) A non-implementation figure of 15% is proposed. As evidenced within the Council’s own calculations (SLAA 2018 Appendix 4), the non-implementation rate is actually 15.5%. We also question whether windfall approvals should be considered within this calculation given that they are ad-hoc in nature and are not brought forward within the Local Plan / SLAA process.
   d) The capacities of the sites allocated for housing within the Plan are overestimated. Appendix 2 to our representations dated 22 February 2018 and Appendix 4 to our representations dated 29 June 2018 demonstrate that the overall supply is c. 796 units over the plan period (not accounting for the deliverability of the A320 works, discussed further below).

21. These concerns remain although the housing trajectory (SD_023G) has been updated.

22. A very significant threat to the delivery of the housing trajectory, including the 5-year housing land supply, is its dependence on the A320 mitigation works. Paragraph 5.40 of the Plan recognises that “the delivery of a number of allocations around the A320 are contingent on the delivery of infrastructure improvements in this area of the Borough”, and policy SD3 sets out the phasing of these sites to align with the A320 works.

23. Paragraphs 7-19 of our statement submitted in response to the Matter 3 questions as part of the Stage 1 hearing detail the major issues facing the delivery of the proposed A320 mitigation
works, including overall feasibility and timing. Most of the housing to be delivered in the area is reliant on the A320 mitigation works being completed, including around 3,700 within RBC.

24. There is a risk that delivery of a substantial proportion of the housing projected to be delivered over the Plan period would be delayed given the lack of firm progress made so far in relation to detailed design, land assembly and funding, and the ongoing delays and discussions between RBC, SCC and HE.

25. We maintain that RBC’s housing need has been underestimated and that the supply identified will not be sufficient to address the need. In addition, as set out about there are significant concerns regarding the extent of and deliverability of the supply shown in the Housing Trajectory and the Plan. In order to meet its housing needs RBC needs to review where housing can be delivered within the borough that is not contingent upon the A320 works coming forward, and must allocate additional land for housing to be delivered both within the both the short (5-year) and long (plan period) terms.

8.3 Does the Plan provide sufficient information about the housing implementation strategy? Should it include a housing trajectory in graphical and tabular forms?

26. Given the requirements for a step change in the delivery of housing over the plan period, the plan should include more explanations of the interventions that will enable delivery of the housing targets. The housing trajectory should be presented in graphical and tabular forms for clarity of presentation and for tracking performance in Annual Monitoring periods.
Hearing Statement dealing with the case for additional age specific accommodation in the Runnymede Borough of Surrey

Nigel Appleton
10th January 2019
1 Introduction

1.1 I am Nigel Appleton, Executive Chairman of Contact Consulting (Oxford) Ltd, a specialist research and development consultancy working at the intersection of health, housing and social care. I am the author of guidance on the estimation of the current and future needs of older people for accommodation and care and have supported a number of local authorities in developing strategies to respond to the needs of an ageing population. In support of planning applications by clients I have provided more than one hundred and fifty reports setting out the need for specialised accommodation for older people. I have served as an Expert Witness in relation to a small number of Appeals by clients against refusal, where estimation of need was a material consideration.

2 The scope of this statement

2.1 I provide data on the current and projected future population of older people within Runnymede Borough, using the most recent projections published by the Office for National Statistics in 2018. I report in summary data on a variety of needs among that older population, which suggests an increasing requirement for specialised accommodation and access to care.

2.2 I draw attention to substantial and increasing levels of owner-occupation among older people as a significant driver for the nature of future provision. The volume and profile of current provision is reported and the need for new models and increasing volumes of provision identified. The context in both national and local policy referenced, leading to a conclusion that the development of a substantially increased supply of Extra Care style accommodation is congruent with current guidance and policy ambitions.

3 Methodology

3.1 The methodology adopted to provide an objective measurement of need for specialised accommodation and care within the Borough draws on my own work for the Care Services Improvement Partnership at the Department of Health and the Department for Communities and Local Government, subsequent industry led guidance to which I contributed, and the work of others in this field. These are among the “toolkits” referred to in the National Planning Practice Guidance as suitable for estimating the needs of older people within a local population.

3.2 The Authority has relied upon estimates contained in the Strategic Housing Market Assessment updated report of 2018. These are reported to have used the

1 Most recently Appeal Ref: APP/U1105/W/17/3177340 The Knowle, Station Road, Sidmouth, Devon, EX10 8HL and Appeal Ref: APP/H2265/W/18/3202040 Land to the rear of 237-259 London Road, West Malling, Kent ME19 5AD
3 Housing in Later Life: planning ahead for specialist housing for older people, Housing LIN, NHF et al, December 2012.
4 SHOP@, Housing LIN & EAC, 2013 and subsequent revisions.
SHOP@ Tool, provided on line by the Housing Learning and Improvement Network (Housing LIN), which is another of the tools referred to in the NPPG 2018 and has the advantage of being available on-line.

3.3 As officers of the Housing LIN have made clear the SHOP@ Tool requires informed inputs, reflecting local circumstances and policy priorities if it is not to produce perverse results. The “default” settings of the tool are intended merely to demonstrate the type of information that needs to be inputted and if not appropriately adjusted will deliver a false output.

3.4 The outputs reported in the SHMA update report reflect the problems that can arise: the default setting for the tenure split between rented and owner-occupied units of Extra Care is the current supply situation. Thus, if uncorrected, the tool will show that if there are currently no units for sale there will never be any requirement for units for sale. In a setting, such as Runnymede, where home-ownership among older people stands at around 80% this is clearly an unsupportable conclusion.

3.5 We note that the Housing LIN position is that it does not assert the use of any particular parameters for provision and that this is a matter that should reflect local need and policy. They offer the further clarification that all the toolkits referenced in the NPPG of 2018 and 2014 have merit and should be accorded weight.

4 The changing age profile of the local population

4.1 As Table One shows a substantial shift in the age profile of the population is already underway. The current population of people sixty-five years of age or older living in Runnymede Borough is estimated to be 15,000. In the years to 2040 this is estimated to rise to 21,700. The steepest rates of increase will be in the oldest cohorts with the number of those ninety years of age or more rising by 144% over that period.

4.2 The profile of age distribution among older people in Runnymede BC is close to, if slightly below, the national average. Currently those 65 years of age or more make up 17.00% of the total population, compared with an average for England of 18.21%.

<table>
<thead>
<tr>
<th>Table One</th>
<th>Population aged 65 and over, projected to 2040 (Runnymede)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2018</td>
</tr>
<tr>
<td>People aged 65-69</td>
<td>3,800</td>
</tr>
<tr>
<td>People aged 70-74</td>
<td>3,900</td>
</tr>
<tr>
<td>People aged 75-79</td>
<td>2,700</td>
</tr>
<tr>
<td>People aged 80-84</td>
<td>2,200</td>
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<tr>
<td>People aged 85-89</td>
<td>1,500</td>
</tr>
<tr>
<td>People aged 90 and over</td>
<td>900</td>
</tr>
<tr>
<td>Total population 65 and over</td>
<td>15,000</td>
</tr>
</tbody>
</table>

(Source: POPPI Database provided by the Institute for Public Care at Oxford Brookes University and Office of National Statistics Crown Copyright 2018)
4.3 Of greater significance, in terms of challenge to the capacity of local services and infrastructure is the projected increase in the proportion of people in Runnymede in advanced old age; that is to say 85 years of age or more. Those in this age group currently make up 2.72 % of the Runnymede population, compared with the 2.44 % average for England.

Table Two

<table>
<thead>
<tr>
<th></th>
<th>Total population, population aged 65 and over and population aged 85 and over as a number and as a percentage of the total population, projected to 2040 (Runnymede)</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>2018</td>
</tr>
<tr>
<td>Total population</td>
<td>88,200</td>
</tr>
<tr>
<td>Population aged 65 and over</td>
<td>15,000</td>
</tr>
<tr>
<td>Population aged 85 and over</td>
<td>2,400</td>
</tr>
<tr>
<td>Population aged 65 and over as a proportion of the total population</td>
<td>17.00%</td>
</tr>
<tr>
<td>Population aged 85 and over as a proportion of the total population</td>
<td>2.72%</td>
</tr>
</tbody>
</table>

(Source: POPPI Database provided by the Institute for Public Care at Oxford Brookes University and Office of National Statistics Crown Copyright 2018)

4.4 The percentages can obscure the impact of absolute numbers: those 85 years or over currently number 2,400 and this number will increase by around 75% to 4,200 by 2040.

4.5 Whilst a significant proportion of this population of older people may remain in general housing there will be a substantial and increasing need for specialised accommodation with access to support and care.

5 Indicators of need for specialised accommodation, care and support

5.1 Those having difficulty with one or more domestic tasks will increase between 2018 and 2040 from 6,325 to 9,546. A failure to manage these tasks often persuades older people, or their relatives, of the need for a move to a high care setting, such as a Registered Care home, when their needs would be better met in specialised accommodation, such as that proposed in this application.

5 All data in this section drawn from POPPI Database provided by the Institute for Public Care at Oxford Brookes University and Office of National Statistics Crown Copyright 2018
5.2 Projections show that the number of those older people who have difficulty with at least one domestic task will increase by 3,221 or fifty-one percent over the period to 2040. 1,336 of these will be people who are eighty-five years of age or more.

5.3 Similarly those experiencing difficulty with at least one task of personal care are projected to rise from 5,183 in 2018 to 7,791 in 2040. This may contribute to additional demand for specialised accommodation but will have a direct impact on demand for care home places.

5.4 Inability to perform the tasks of personal care is a powerful indicator of need for assistance. That an additional 2,608 or fifty percent of older persons in the Borough of Runnymede will need assistance by 2040 suggests that a major effort will be needed if their quality of life is not to be diminished and they are not to be placed at risk. That 1,102 of these persons will be eighty-five years of age or more heightens the concern that the difficulties they experience should receive a proper response.

5.5 In all age cohorts above sixty-five there will be a marked increase in those within the population that are unable to manage at least one mobility activity on their own. The highest rate of increase is among those eighty-five years of age and over with 750 more older people in this age cohort finding one or more mobility activities difficult or impossible by 2040. This age cohort is a key group when looking at the transition into institutional care and will have an impact upon demand for specialised accommodation and support services.

5.6 Throughout the period to 2040 there is predicted to be a 63% increase in the population aged sixty-five and above that have dementia. This significant rise will again place increasing demand on care and accommodation places.

6 Shaping an appropriate response to the identified need

6.1 Appropriately designed, accessible accommodation with access to flexible support and care services can mitigate the risks, sustain independence and facilitate the delivery of care in a cost-effective fashion to moderate the demands that will otherwise fall on existing services as a consequence of these trends. A fully robust pattern of provision that matches the aspiration of individuals and of public policy that people should be able to age in place requires a number of elements: appropriately designed accommodation, a range of support and care services and specialised provision for those with the highest levels of need for care.

6.2 Whilst a proportion of those with low to moderate needs may be supported in their existing dwelling in general housing this is dependent upon the design of the dwelling and secure access to appropriate levels of care and support. In reality such access cannot always be secured and even multiple care visits in the course of the day do not address the issues of loneliness, isolation and depression experienced by many older people living in general housing.
7 Responding to need among older home owners

7.1 Whilst public policy has traditionally focused on the needs of those older people who require socially funded rental accommodation, the trend among older people has been toward an increasing level of owner-occupation.

7.2 Levels of owner-occupation among older people in the Borough are substantially above national averages at 81.61% for those in the Borough between 65 and 74 years of age. In the oldest age-group the level of home ownership may be slightly depressed by lack of options for owner-occupation in specialised accommodation but remains just above 74%.

7.3 The current supply of specialised accommodation, including registered care homes, has been calculated using the Elderly Accommodation Counsel database.

7.4 This is a pattern of supply that is relatively neglectful to the needs of those older home owners who need Extra Care, particularly those who wish to maintain their tenure of choice and quality of accommodation as they move to specialised accommodation.

7.5 Whilst there is a substantial supply of leasehold retirement housing this comes nowhere near reflecting the dominance of owner-occupation among the older population of Runnymede. There is a consequent shortfall in the level of provision needed to achieve an adequate supply for older homeowners wishing to maintain their tenure when transferring to specialised accommodation.

7.6 For those older people who are owner-occupiers the ratio of provision for retirement housing for sale per thousand is 146.96. Whilst for those older people who are renters the comparable ratio per thousand is 595.58. The majority of those entering old age as homeowners will wish to maintain that tenure and there are sound economic arguments for the individual and for the public purse to support that.

8 Guidance from national and local policies

8.1 The whole thrust of recent legislation and guidance from national government has been to encourage the delivery of care and support to people in their own homes or where a move to a more accessible, manageable environment is indicated, to a setting that provides the characteristics of home: self-contained accommodation with a tenure of choice.

8.2 The local policy and strategic context supports the further development of housing and care options for what is recognized to be an increasing number of older people. This is to be seen in the Adult Social Care Commissioning Strategy for older people in Surrey 2011 – 2020, the Promoting Wellbeing in Older People Strategy, July 2017, and the Surrey County Council Accommodation with Care & Support Strategy, among others. Whilst, in the social rented sector these documents favour a particular model of Extra Care, they recognise the range of models that may be adopted by commercial providers.
8.3 Runnymede’s own policy documents, including those developed to support the Local Plan, acknowledge the increasing importance of responding to the needs of an ageing population but fails to offer a balanced and proportionate response in relation to specialized accommodation.

9 Benefits to the local Health and Social Care Economy of increasing provision of specialised accommodation for older people

9.1 The recent report of the Communities and Local Government Select Committee on the future of housing for older people\(^6\) cites evidence of benefit, not only to individuals, but also to the Health and Social Care economy. The report asserts:

“There is a significant body of evidence on the health and wellbeing benefits to older people of living in specialist housing and the resultant savings to the NHS and social care. This is particularly the case for extra care housing, which has onsite care and support and communal facilities. In addition, this type of housing helps family and carers finding it challenging to provide enough care and support”. (Para 87)

9.2 In responding positively to the Select Committee’s endorsement of ExtraCare Housing for older people, regardless of tenure, Government asserted in their formal response of September 2018\(^7\):

“We are committed to promoting supply and investment in extra care housing. We recognise the importance it plays in helping older people live safely and prevent more intensive interventions. We expect local authorities to plan for this type of provision in their area.”

9.3 The Committee sets out its conclusions in unambiguous terms:

“Specialist housing, and particularly extra care housing, can promote the health and wellbeing of older people and their carers, leading to savings in spending on health and social care.” (Para 91)

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\(^6\) House of Commons Communities and Local Government Committee Housing for older people Second Report of Session 2017–19 Report, together with formal minutes relating to the report Ordered by the House of Commons to be printed 5 February 2018

\(^7\) Government response to the Second Report of Session 2017-19 of the Housing, Communities and Local Government Select Committee inquiry into Housing for Older People. Cmnd 9692, September 2018
10 Summary and conclusions

10.1 Whilst this is a marginally “younger” population than national averages older people make up a substantial and increasing proportion of the population with emerging needs that impact and the requirement for accommodation of various types.

10.2 Although there is a substantial existing supply of specialised accommodation for older homeowners in Runnymede, but it does not match the level of need and potential demand.

10.3 Older homeowners make up such a substantial, and increasing, proportion of the local population that a failure to offer appropriate accommodation and care options will lead to unsustainable pressures on local services and unsatisfactory outcomes for individuals.

10.4 In conclusion I offer seven key contributions that an increased supply of specialised accommodation will make to the public good:

1. It will respond to the accommodation needs and aspirations of the substantially increasing number of older people in the area.

2. Through sound design and appropriate facilities and services it will provide an environment in which quality of life will be enhanced, independence maintained and the conditions and risks characteristic of advanced old age will be mitigated.

3. It will offer a robust pattern of provision to maintain its care and support for the resident population as individuals age and exhibit increased levels of need.

4. It will assist in the renewal of the housing stock designed to meet the needs of older people and in addressing the tenure imbalance found in the current pattern of provision.

5. It will mitigate the increasing pressure upon both primary and secondary health services and social care services in the area.

6. It will offer an attractive option to those older home-owners who may be considering moving to smaller and more easily managed accommodation, freeing up under-occupied family accommodation to more appropriate occupation, thus mitigating the demand for new-build housing.

7. It will help deliver the policy aspirations of Surrey County Council, its health partners and Runnymede Council in responding appropriately to the levels of need which have been identified.