Dear Ms Travers

RUNNYMEDE LOCAL PLAN EXAMINATION – POLICY SL23 OLDER PERSONS’ ACCOMMODATION

Thank you for the invitation to put forward a proposed revision of policy SL23 relating to older persons’ accommodation. Our proposals are shown in the attached document as tracked changes to the original policy and supporting text (relating to older persons’ accommodation only; no changes have been made to the discussion of or policy relating to student accommodation). The changes have drawn from Nigel Appleton’s contributions to the Matter 7 discussions held on 7 February 2019 as well as the evidence provided in the Matter 7 and 8 statements submitted on behalf of Elysian Residences (Representor ID 2006).

As discussed at the Matter 7 hearing, we consider that there is a critical shortfall in the existing and projected provision of Extra Care (C2) units over the Plan period, as well as a need for a diverse range of accommodation covering location, services, tenure and quality of built form. Amendments addressing these considerations are set out in paragraph 6.55 of the attached and new paragraphs 6.58-6.59, as well as the third bullet point within the policy text itself. We have also suggested flexibility in the affordable housing requirement to allow for off-site provision where appropriate.

The Matter 7 discussion also addressed the need for specific site allocations for extra care accommodation to account for its unique locational requirements and ensure such accommodation can be brought forward in the Plan period. This is reflected in the second paragraph of the policy wording.

Finally, new paragraph 6.61 has been added to provide a clear justification for the aspirations of the policy to meet the acute needs for extra care housing through a range of specialised accommodation.

We hope the attached is helpful, and should you have any queries please do not hesitate to contact us.

Yours sincerely

ALEXANDRA MILNE
DP9 LTD.

Encl.
Older People

6.54 The SHMA has identified that, given the growth in the older population and the higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing in the Borough over the Plan period. However, this provision should be one of providing a range of tenures and types of accommodation that support independence, well-being and inclusion for older people and avoid should not contribute to the development of unbalanced communities which can arise when appropriate options are not provided for all sections of the population.

6.55 The commissioning statements produced by Surrey County Council in their “Adult Social Care Commission Strategy 2011-2020" and their “Accommodation with Care and Support Strategy” (September 2018), as well as the Strategic Housing Markets Assessment produced by the Council advocate and increased supply of specialised accommodation for older people sets out the level of need for such accommodation within the Borough. This has been variously estimated but the current shortfall in Extra Care (C2) units is around 200, with a requirement for a further 150 units by the end of the Plan period, divided on a one third/two thirds basis between units for rent and for sale.

6.56 Some of the allocated sites. The proposed allocation for Longcross Garden Village plans to deliver a range - 60 units of specialist housing needs for older people, but outside of these sites, Policy SL23 sets out the criteria for assessing proposals for specialist accommodation for older people, including sheltered housing, extra care accommodation, and care homes, including its appropriate location, consistent with NPPF paragraph 50.

6.57 Residential care accommodation should normally be located within settlements where there is easy access to a range of services, e.g. shops, healthcare and social facilities. This should assist non-car access to local facilities for residents and staff, and help ensure the facility is accessible for staff and visitors. Applicants may wish to demonstrate local need for residential care provision, having regard to the priorities of the NHS and County Council.

6.58 It is recognised that Runnymede’s ageing population will have diverse needs which will need to be met by a range of facilities, services, locations and tenure, and recognising the increasing need for owner-occupation of such units. Older people make a substantial contribution to the economic, social and cultural life of Runnymede and it is appropriate for the policies of the Plan to be aspirational, realistic, and fair in the options they seek to provide for the older citizens of the Borough.

6.59 An appropriate and attractive range of specialised accommodation to meet these needs could have the benefit of stimulating movement within the borough’s housing market allowing for a more effective use of existing stock and realising benefits of downsizing, including the release of family-sized accommodation.

Policy SL23: Accommodating Older Persons and Students

The Council will seek to provide accommodation for older persons within the Borough which reflects their identified tenure needs.

The Council will allocate land for the delivery of specialist accommodation for older people (see insert new allocations). Additional proposals for specialist accommodation for older people, including sheltered housing, care homes and other appropriate forms of accommodation for the elderly/older people and those with particular needs, will be permitted, provided that the development:

- meets a demonstrable established local community need for the proposal;
- is readily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and their visitors; and
- contributes to a range of offer in terms of diversity of need, quality of built form, facilities and services and affordability.

Subject to viability, where accommodation falls within use Class C3 an appropriate proportion of affordable housing in accordance with policy SL20 will be required with the mix of tenures negotiated by the Council having regard to advice from the NHS or Surrey County Council. Where it is not practical to provide affordable housing on-site, consideration will be given to off-site provision.
Justification for inclusion of policy

6.61 There is currently a limited range of options for older home-owners who make up the overwhelming majority of the population of older people in Runnymede. To provide even the modest target of 4.5% of the older population (those 75+) with the option of an Extra Care solution to their housing and care needs requires a substantial increase in supply. A substantial shift is the age profile of the Borough’s population is projected during the Plan’s lifetime. The number of people aged 85 or over is projected to increase by around 29% by 2030 and 75%, and the number of older people who have difficulty with at least one domestic task will increase by 51% to 2040.

6.62 Paragraph 50 of the NPPF states that to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, LPAs should (amongst other things), plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes). Policy SL23 would help deliver this national policy requirement. Whilst students are not specifically mentioned in paragraph 50 of the NPPF, given the location of a university campus in the Borough, it is considered that students are a relevant group whose needs should be assessed and provision made.

6.63 Policy SL23 will help to deliver Local Plan objectives 2 & 11.