

Note on Older Peoples housing, Self-build accommodation and Starter Homes in response to the Allocations Plan Inspector's Interim findings paragraphs 69, 70 and 71.

10th October 2016.

## **Older Peoples housing**

1. The 2014 Strategic Housing Market Assessment (SHMA) December 2014 update calculates that over the period 2013-2031, there is a requirement for 1506 additional units of accommodation for older people. As part of this requirement it identifies a need for 573 bedspaces (accommodation in residential homes or other grouped units). These figures are agreed.
2. The council acknowledges the contribution that specialist housing can make in meeting housing need and that it is important that specialist housing and or bedspaces that are delivered are counted appropriately.
3. Whilst it is acknowledged that the concept of adopting a target figure for institutional bedspace accommodation would make a more positive commitment to addressing the need for such provision; the Council is unsure whether the setting of such a target will be beneficial and has doubts about the figure that should be used. Whilst the SHMA estimates the future need for such provision, the SHMA heavily caveats this, identifying a number of issues that could potentially reduce the number of households that will actually seek such accommodation.
4. As the SHMA identifies there is no study of people's attitudes towards moving into specialist accommodation. As reflected by changes in national policy, people's attitudes toward residential bedspace accommodation have changed with people increasingly wanting to remain in their homes near to their family/friends and support networks etc. In recognising this shift in attitude, Gloucestershire County Council in line with national policy, are focussed on ensuring that care provision is aimed at enabling residents to remain in their own home rather than moving them into residential "bedspace" accommodation.
5. The outcome of this shift towards enabling residents to remain in their own home appears to have been a continual trend in the increase of vacant residential bedspaces in the Forest of Dean. There are currently 61 vacant bedspaces in residential accommodation within the Forest of Dean.
6. Consideration also needs to be given to different forms of provision of housing with care:
  - Sheltered/ Retirement accommodation - There are many different types of sheltered housing schemes. Some will have a scheme manager (a

warden) who lives onsite or offsite, and all should provide 24-hour emergency help through an alarm system.

- Accommodation is usually self-contained, but there are often communal areas, such as the lounge, laundry room and garden. Many schemes run social events for residents. Such provision will be based on self-contained units of accommodation. Whilst such provision will help meet the needs of the older people, this has always been considered to be individual housing rather than bedspaces.
- Housing with Care (also known as Extra Care Housing)- Housing with Care is a specialist type of housing designed with older people in mind. It allows people with long-term conditions or disabilities that are unable to manage in their own home to continue living independently rather than having to move into residential care. Such provision allows residents to access differing levels of personal care, meals and on-site 24 hour support. Typically these schemes will have communal areas that include dining facilities, bathing facilities and other community spaces. In some areas, these may be shared with the local community. It is particularly useful for couples who have different needs. Housing with Care can be presented in different forms, from a development of single storey apartments or bungalows to flats or properties within a retirement village. They all will provide individual units of accommodation where the resident has the security and privacy of their own front door.

7. Whilst Sheltered/ Retirement accommodation and Housing with Care will help meet the needs of older people, this always be considered to be individual housing rather than bedspaces The question therefore is with the change in care provision being focused on enabling individual's to remain in their own home and the alternative forms of older person's accommodation that can meet the needs of older people, then what should be counted against the SHMA calculation of the number of bed spaces required.
8. It is proposed to make a MM to the AP in order to recognise the need for specialist accommodation (MM001). Beyond this and the individual comments in some of the policies which allocate sites, the adoption of a target figure could be considered. In the light of the changing conditions outlined above and the current surplus of accommodation, it is not considered appropriate. It is necessary to monitor need and use this to inform development management decisions. Although this approach will require planning applications to come forward when there is a demand, the fact that the accommodation needed is provided by a variety of private companies and housing associations means that this will be the case. It is not considered appropriate to make individual allocations due to the variety of accommodation (new build and conversions) that are potentially suitable.

### **Self-build/custom Build**

9. The Self Build and Custom Housebuilding Act 2015 requires from April 2016 that relevant authorities keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land for self-build and custom housebuilding.
10. As it can be seen the introduction of the Self Build and Custom Housebuilding Act occurred after the production of the SHMA. The council has complied with the requirements of the Act and has a register in place for households who are interested in self-build to register their interest. To date there are 7 households who are registered on the self –build register. Four of these households have a forest of Dean connection whilst three households are from outside of the county. All of these households seek individual sites in different parts of the district, and are not interested in any self-build plots that maybe provided as part of a larger allocated development.
11. The Act requires that authorities must have regard to the register when carrying out their functions in relation to planning and housing. Given the relatively recent introduction of the register, the low number of households registered, and the preference for individual sites, it would appear that there is no scope for specific allocations. The situation should be monitored and should demand increase and change to one where there is a need for larger schemes, permissions could be granted on allocated and non- allocated sites both for the development of entire sites and for an element within a larger scheme. While the Council will respect national policy that provision should be available, it is felt that it can be met through sites with planning permission, or by permitting other schemes (including self- build elements in larger developments) in suitable locations should the demand be there.

### **Starter Homes**

12. On the 24th May 2016 the Government published the Housing and Planning Act 2016 (the Act). The Act includes the primary legislation for Starter Homes.
13. Prior to the Housing and Planning Act 2016 the government In December 2015, published a consultation on further changes to national planning policy to amend the definition of affordable housing so it encompasses a larger range of products that can support access to home ownership, and these include “ starter homes”. The Government then undertook a Starter Homes Technical Regulations’ consultation to introduce regulations to underpin the new statutory framework for starter homes and which proposes that starter homes would be required on all reasonably sized housing sites.

14. At present there is no further guidance, affordable housing has not been redefined to include starter homes and it is not known how provision will be required to be made (eg a fixed percentage of all housing on particular sites, or a number which address the identified need). There is at present no knowledge of any threshold on size of site to which any regulations may apply.
15. Until a statutory framework is published and the council understands how the implementation of starter homes will be achieved and how it may affect any potential affordable housing provision, the council considers that it is unable to accurately review the AP policies for such provision. It is however considered appropriate to make a reference to starter homes in the AP text in order to indicate that the Plan will enable national policy to be applied and provision in accord with any regulations to be made. A suitable addition to the text could be made at the end of 2.9 of the Submission Draft, after the present paragraph... “Affordable housing continues to be an important aspect of overall provision and the AP will support this either in accord with CS policy CSP5 and CS 6.34 or as it may be updated by changes in national or other policy, including any changes in the definition of what constitutes affordable homes. The prevailing definition and methods of provision will affect what affordable housing is delivered, and the Council will seek the most appropriate provision for the area within the overall (national) guidance”.