

SD115: Planning the Care Provision for the Purbeck Area in response to actions 33, 34 and 47 arising from the Purbeck Local Plan 2018-2034 examination in public

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Executive summary

1. Care provision was set out in policies within the Purbeck Local Plan 2018-2034. It planned for care that consisted of registered care homes for the elderly with complex care needs and specialist purpose built housing to help meet the needs of the disabled and the elderly without complex needs.
2. Throughout the examination process for the Purbeck Local Plan 2018-2034, the National Planning Practice Guidance (NPPG) was updated placing significant emphasis on meeting the needs of the disabled and the elderly. At the same time Dorset Council's Adult Social Care department alerted us they were moving away from providing traditional nursing care and would rather we provided extra care instead. As the PPG states that 'housing needs is something to be considered from the early stages of plan-making through to decision-taking' (PPG Reference ID: 63-001-20190626) it was thought sensible to propose changes to the policies affecting care provision during the examination as its 'important to plan early to meet their needs throughout their lifetime' (PPG Reference ID: 63-002-20190626) and the Council interprets 'early' to mean at plan making stages. Therefore at the second set of hearings the Council proposed changing the requirement for care homes within Policy H4: Moreton Station / Redbridge Pit and Policy H5: Wool to that of extra care homes instead.
3. As the changes could impact on various elements of the plan such as the viability of the housing schemes, the footprint of the land available and the deliverability of the care provision, the Council were asked to give more thought to the implications of this change, the definitions of care provision and the interplay between the site specific policies and Policies H9: Housing Mix and H10: Part M of the Building Regulations.
4. The Council has worked with the land promoters, Adult Social Care and The Retirement Consortium in considering the implications of the change. To enable the deliverability of successful care provision, Policy H4: Moreton Station / Redbridge Pit, Policy H5: Wool, Policy H9: Housing Mix and Policy H10: Part M of the Building Regulations were reviewed and proposed changes are within this document.
5. The changes remove the requirement for care homes and replace this with extra care homes. They also remove the requirement for sheltered housing from Policy H6: Lytchett Matravers and Policy H7: Upton and they increase the requirement for M4(2) standard housing to 20% of the overall housing requirement on all of the housing allocations within the plan.
6. The changes also remove the requirement for self-build plots and single storey housing from the site allocations and encourage this on schemes of 20 or more homes. The final change allows for future care provision to be considered on sites not allocated within the plan.

Introduction

7. The Purbeck Local Plan 2018-2034 when submitted in January 2019 proposed meeting the needs of the ageing population and the disabled via specialist purpose built accommodation, accessible accommodation, single storey homes, adaptable and accessible homes and care home provision. The requirements were set out in the following policies:
 - Policy H4: Moreton Station/Redbridge Pit and Policy H5: Wool required a 65 bed care home each;

- Policy H9: Housing Mix required 20% of the housing allocations to provide specialist purpose built care accommodation;
 - Policy H9: Housing Mix required schemes of 20 or more to provide 10% single storey housing;
 - Policy H9: Housing Mix required schemes of 20 or more to provide 5% self-build plots; and
 - Policy H10: Part M of the Building Regulations asked for 10% of the new homes on sites of 10 or more or greater than 0.5 ha to meet the Building Regulation optional requirement M4(2): 'Category 2 – accessible and adaptable homes'.
8. During the Purbeck Local Plan 2018-2034 examination process Adult Social Care alerted the Council they needed extra care facilities and were moving away from the traditional registered care homes. This is because new models of enhanced and extra care housing provide for a range of care requirements allowing for changing circumstances to occur 'in situ rather than requiring a move' (para 9.6, SD21). This type of accommodation facilitates independence and safety and crucially allows people to own their own home outright, via shared equity or tenancy rights, placing less strain on finances for the public and the Council, all elements fulfilling the criteria in the PPG.
9. As this information was not known to the Council until late in the examination process of the Local Plan it was not taken into consideration during the preparation of the submission draft Local Plan. Since then, the PPG has been updated placing emphasis on delivering housing for the disabled and the elderly that allows them to live independently for longer. The PPG claims that 'housing needs is something to be considered from the early stages of plan-making through to decision-taking' (PPG Reference ID: 63-001-20190626) so it was thought prudent to continue to refine housing requirement for the elderly and disabled during the examination process of the Local Plan.
10. Due to the information presented to the Council by Adult Social Care, the Council proposed the two 65 bed care homes within Policy H4: Moreton Station / Redbridge Pit and Policy H5: Wool be replaced by 65 extra care homes at each of the sites. This change was presented at the examination in public in August 2019.
11. As this change could impact on various elements of the plan such as the viability of the housing schemes or the footprint of the land available, the Council were asked to give more thought to the implications of this change to consider the definitions of care and any potential overlap between requirements of the site specific policies and policies H9: Housing Mix and H10: Part M of the Building regulations.
12. This report presents:
- implications of change and interplay between Policy H9: Housing mix and Policy H10: Part M of the Building Regulations;
 - legislation, policy and aspirations surrounding meeting the needs of the elderly, the disabled, affordable housing and the self-build and custom build register;
 - an explanation of the need identified in the SHMA and its comparison with current statistics; and

- proposed changes to the policies that accord with legislation and policy, aligns with the aspirations of Adult Social Care and provides deliverable care provision to achieve the need identified.

Implications of extra care and the interplay between Policies H9 and H10 and the site specific policies – what are the concerns?

Extra care definition

13. The definition of extra care in the PPG is sufficient for the purposes of this plan. However, the use class definition of extra care is debated nationwide and the Council would like to clarify their interpretation of the provision.
14. Use Class C2 applies to residential institutions but use class C3 applies to carers and those receiving the care. Extra care housing consists of self-contained dwellings meaning each resident has their own front door. Regardless of the level of care they receive, this means they are not living in an ‘institution’, they are receiving care within their own private home, this is akin to use class C3.
15. Therefore the Council will assume the use class of the extra care to be C3 as each unit will be its own self-contained home where carers and those receiving the care can reside.

Extra care – do the sites have capacity to accommodate this?

16. To determine whether the sites have capacity for extra care homes or not, we can compare the footprint of a care home with the footprint of an extra care facility.
17. An project carried out by Newcastle University and Churchill Retirement Living and supported by Housing LIN states site acquisition for care provision is ‘admirable’ when, amongst other criteria, the size of site is, ‘0.4 to 1.5 acres (on average supporting 40 units per development, ranging from 25 to 75)’¹. Based on this guidance, this would result in densities of 50dph to 65dph.
18. Recent extra care facilities in the Dorset area give an indication of the sizes of sites and densities of sites for extra care provision in Dorset. Three in particular are as follows:
 - Trailway Court Blandford (2/2008/1148);
 - St Martin’s, Gillingham (2/2018/1437/FUL): and
 - Peverell Avenue, Dorchester (outline 1/D/12/001301; reserved matters WD/D/15/001122)

Site	Size	Number of units	Density
Trailway Court, Blandford	0.48	44	91 dph
St Martin’s, Gillingham	0.70 ha	59	84 dph

¹ Retirement living explained - <https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Retirement%20Living%20Explained%20-%20PDF%20version1.pdf>

Peverell Avenue, Dorchester	0.53 ha	63	119 dph
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Table 1: Shows size of site, number of units and density of extra care sites in Dorset

19. Taking the example from within rural Dorset as shown in table 1, the Gillingham care scheme is at the lowest density proposing about 59 units on a 0.7 hectare site. This means that roughly 16% more land is required for extra care than a care home.
20. For a 60-unit scheme, the extra land required would only be 0.1 hectare and it is believed that the sites at Moreton Station /Redbridge Pit and Wool have capacity to accommodate this extra land required.

Extra care – is this viable and deliverable?

21. From the table above we can see that the size of extra care schemes are on average 55 units in size. Care South support this stating extra care facilities are normally delivered in schemes of 50 or more to achieve financial and staffing viability. From this information we can assume a 65 unit care scheme is deliverable. In addition to this, the land promoters at Wool and Moreton Station / Redbridge Pit do not object to the inclusion of an extra care facility in replace of nursing care home (see appendix C for details).

Care provision set out in Policy H9: Housing Mix and its interplay with the site specific policies

22. The submission proposals ask for the housing allocations to provide 20% of their overall total as specialist purpose built housing. In the SHMA this means sheltered housing or retirement housing. The land promoters at Lytchett Matravers and Upton raised concerns about the deliverability of this proposal. Additionally The Retirement Consortium advised that sheltered housing is typically delivered on schemes of 35 homes.
23. 20% of the allocations at Lytchett Matravers and Upton would only achieve a maximum of 19 dwellings on site. This is not large enough to accommodate the minimum of 35 dwellings for sheltered housing.
24. Concerns were also raised about the requirement for single storey homes claiming this was doubling requirements for care provision that spanned specialist purpose built housing and potentially Part M of the Building Regulations.

Summary of concerns

25. In summary, the concerns raised by the land promoters surround Policy H9 and Policy H10 and their prescriptive requirements. In particular on the larger sites the requirements had the potential to impact deliverability and viability and on the smaller sites the requirements were not marketable, see comments from the developers at appendix C.
26. To resolve these issues the council looked again at the evidenced need in order to ascertain if any policies could be altered to alleviate concerns raised by the developers whilst ensuring the Council can still meet the needs of the disabled and the elderly.

What are the needs of the elderly and the disabled in the Purbeck area?

National Planning Policy, the elderly and disabled

Who are the elderly?

27. The elderly are described in the National Planning Policy Framework (NPPF) glossary as 'people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs'.

Who are the disabled?

28. The NPPF describes people with disabilities as those with 'a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs'.

National Planning Policy Framework and Planning Practice Guidance

29. The NPPG claims an understanding of the needs of the elderly is critical from plan making to decision taking due to the predicted doubling of this sector of society by mid-2041 (PPG Reference ID: 63-001-20190626).
30. The key to meeting the needs of the elderly is grounded in the provision of suitable housing. Suitable housing would offer a choice of accommodation and enable people to 'live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems' (ibid.) Whereas housing for the disabled should help them live 'safe and independent lives...with greater choice and control (ibid).
31. The NPPF adds further detail at paragraph 61, stating that plans should reflect 'the size, type and tenure' of housing for the elderly and the disabled in their policies.

Strategic Housing Market Assessment (SHMA)

32. The Strategic Housing Market Assessment (SHMA) [SD21]² was carried out in 2015 to provide baseline data and estimated requirements for housing over the whole of the Eastern Dorset Housing Market Area (HMA). The chapter this report focusses on is entitled, 'Households with specific needs' and begins on page 146. It provides information on predicted demographic changes and compares this with the existing supply of housing for the elderly to form an idea of the amount and type of housing the plan should provide.

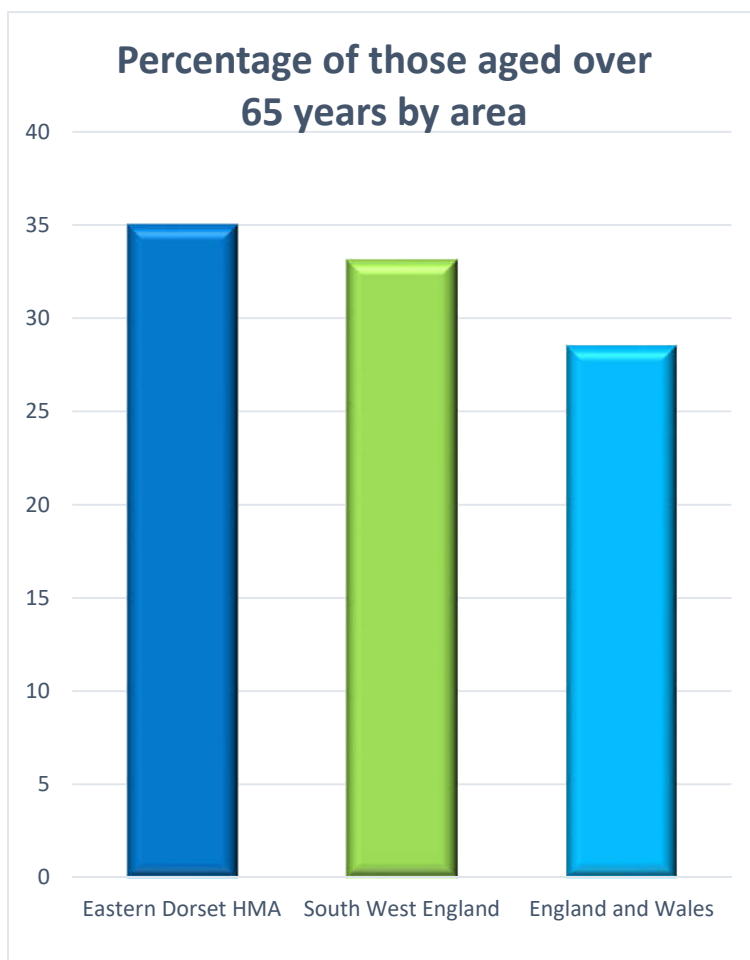
Increased elderly population

33. The SHMA states that the population of those over 55 was higher in the Housing Market Area (HMA) than in the South West Region and England and Wales as shown on Graph 1. Using

² Link to SD21: Eastern Dorset Strategic Housing Market Assessment 2015 - <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/purbeck-local-plan-submission.aspx>

the Projecting Older People Population Information System (POPPI) and its predicted demographic changes, the SHMA focussed on the needs for those with dementia and mobility problems. The statistics showed an estimated 72.7% increase in the number of people with dementia and an estimated 58.5% increase in those with mobility problems over the period from 2013 to 2033 (table 64, SD21).

34. The SHMA went on to identify the current supply of suitable housing for the elderly (named ‘specialist housing’) in the Eastern Dorset area (table 65, SD21, replicated in table 1). As you can see from the table below, the current supply of sheltered housing in the Eastern Dorset HMA is much more significant than that of enhanced sheltered or extra care housing.



Specialist housing

35. Using the existing supply and the demographic projections showing increased population sizes the SHMA was able to utilise ‘a toolkit...developed by Housing LIN, in association with the Elderly Accommodation Council and endorsed by the Department of Health’ (para 9.29, SD21) to establish the need for housing for older people.

Type of specialist housing	Affordable	Market	Total
Sheltered	4,806	3,452	8,258
Enhanced Sheltered	84	196	280
Extra care	441	133	574
Total	5,331	3,781	9,112

Table 2: Showing the existing specialist housing in the Eastern Dorset Area

36. The toolkit suggested a provision of about ‘170 units of specialised accommodation (other than registered care home places) per thousand people aged over 75 years’ (para 9.30, SD21) was required. In 2015 when the SHMA was produced the population projections were based on the 2012 ONS figures and the requirement for specialist housing in the Purbeck area was 598 homes between 2013 and 2033.
37. It was recognised that some of the specialist housing could be provided by a mix of smaller homes such as one or two bedrooms suitable for those retiring early ‘provided they are built to Lifetime Homes standards’ (para 9.34, SD21) and that bungalows were very popular to older people downsizing (para 9.35. SD21).

Registered care

38. Also using the current supply, the population projections and the toolkit, the SHMA identified a need for registered care places in the Purbeck area. Though the SHMA identified a deficit of 131 bed spaces (use class C2) between 2013 and 2033 (table 67 of SD21), it went on to state that ‘it may be the case that an increase in this number (the current supply) would not be required’ (para 9.36, SD21) due to the new models of provision such as extra care housing (use classes C2 or C3). The SHMA claimed there has been a falling demand for registered care together with a ‘rapidly rising average age of people living in sheltered housing over 20-years, requiring higher levels of support’ (para 9.6, SD21). Also that registered care is expensive for the public and places strain on local authorities’ expenditure. However it warned that housing for particular groups ‘such as those requiring specialist nursing or for people with dementia’ (para 9.36, SD21) needed recognised.

SHMA’s indication of requirement

39. To summarise the SHMA indicated a requirement for two forms of housing; specialist and registered care. The specialist housing is broken down into sheltered, enhanced sheltered and extra care housing together with housing for the retired, in terms of the definitions within the PPG, these equate to extra care housing, sheltered housing, retirement living and age restricted housing. The registered care is broken down into nursing homes and extra care. The need expressed in the document is shown in the table below.

Category	Specialist built homes (C3)	Registered care (C2)
Need	598	131

Table 3: Showing the need identified in the SHMA 2015

Care accommodation needs assessment 2018-2028

- 40. A care needs assessment called ‘Building the Right Assets’ attempts to assess the level of different care needs around Dorset between 2018 and 2028. The assessment used the findings from the Eastern Dorset Strategic Housing Market Assessment (SHMA) together with expert and local knowledge to formulate a housing requirement for the project period.
- 41. The assessment concluded that residential care (registered care) needs should be reduced and replaced in part through the provision of extra care and supported living (page 80). This would enable people to live more independently for longer (page 23). As shown in the Council’s monitoring reports there have been 13 care bed spaces and 6 retirement flats delivered in the Purbeck area since 2015. None of these have been for extra care.
- 42. The assessment considers Purbeck to be a priority area for new developments of supported housing (page 21). To be clear, supported housing can mean extra care or sheltered housing.
- 43. The summary of need identified for Purbeck is shown in the table below.
- 44. The assessment does not expect the number of learning, mental or physical disabilities in working age adults to increase significantly (page 16-17) but claims there is a shortage of supported housing services for working-age adults with only 16 units, 13 of them shared accommodation within the Purbeck area (pg. 21).

Recent demographic forecasts

45. Recent figures from POPPI, as shown in appendix A, continue to predict a 30% increase in those over the age of 65 between 2019 and 2035. However they also indicate that the increase in those aged over 65 years old with dementia or mobility problems will be less than previously indicated. The new predictions suggest an increase of 46.0% in those with dementia, reduced from 72.7%, and an increase of 37.2% in those with mobility problems, reduced from 58.5%. A slightly reduced need for complex care requirements supports Adult Social Care's approach of moving away from traditional nursing care provision.
46. Additionally since the SHMA was carried out, population projections indicate a slower rate of population growth in Purbeck. Applying the same formula of 170 units of specialist accommodation per thousand people aged over 75 years, using the recent POPPI statistics as shown in appendix A, gives a total requirement of **476 specialist built housing units** over the plan period.
47. PANSI statistics, as shown in appendix B, indicate a 5% increase in 18-64 year olds with learning, mental or physical disability supporting the claims made in Building the Right Assets that mental, learning and physical disabilities in working age adults is unlikely to increase significantly.

Affordable housing and care provision

Planning Policy

48. Paragraph 64 of the NPPF expects 'major development involving the provision of housing....should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students)'.

Affordable housing

49. Purbeck has a high number of pensioner households that currently own their property, with 2,779 owning their own property and 166 privately renting (para 9.22 SD21). Only 96 are in the social rented sector, but should suitable housing be provided, this could potentially free up another 96 homes available for social rental over the plan period.
50. Multiple pensioner households have a higher level of owner-occupation than single pensioner households, with the proportion of single pensioner households increasing (para 9.14, SD21). If trends continue housing for the ageing population will need to increase and provide a mix of affordable and market sector housing. The SHMA suggests supported housing should be 'split roughly 50:50 between the affordable and market sectors' (para 9.32, SD21).
51. Viability work carried out on the plan and The Retirement Consortium indicate this split is not achievable.

Self and custom build housing

Planning Policy and legislation

52. Self-build and custom-build housing is described in the NPPF as 'Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), is contained in section 1(A1) and (A2) of that Act'.
53. Section 1(A1) of the Self Build and Custom Housebuilding Act 2015 (as amended) requires Councils to keep a register of those seeking serviced plots of land to build houses to occupy as their home. Section 1(A2) requires Council's to publicise the register.
54. The NPPF requires local planning authorities to plan to meet the needs of those on the self-build register (paragraph 61).

Dorset Council's Self-Build register

55. The council had 88 people on the self-build register when the Council devised the provision for self-build and custom build housing within Policy H9: Housing Mix. This has recently reduced to only 1.

How can the Council meet the needs the needs of the elderly and the disabled in the Purbeck area?

56. Slight alterations to the proposed policies were drawn up in discussion with the land promoters, Adult Social Care and The Retirement Consortium to meet the need identified.
57. Definitions have been revised to align with those in the PPG. Supported housing is the name the council is giving to the overarching requirement for sheltered housing, retirement living and age restricted housing.

Nursing care

Registered care

58. The need for registered care identified in the SHMA was 131 bed spaces between 2013 and 2033. Using evidence from the SHMA, from recent demographics and from Adult Social Care needs assessment it can be concluded that this need has reduced.
59. As Wareham Health Hub is likely to deliver a 69 bed care home (C2), and as there have been 13 care bed spaces delivered in the Purbeck area since 2015 together with Adult Social Care's agenda that moves away from this type of care provision means the need for further traditional nursing care provision as originally stated in the SHMA is no longer required.
60. 82 care bed spaces will have been provided over the plan period and it is considered this will be sufficient. The remaining 49 homes identified in the SHMA as needing to be for registered care needs will now be delivered as specialist built housing.

Specialist built housing

61. The requirement for specialist built housing identified in the SHMA has reduced as this was based on population projections which have decreased over time. Taking the assumption that there should be 170 dwellings per 1,000 homes and applying this to the current proposals

gives a requirement for 476 specialist built homes. 49 extra dwellings need to be added to this total to accommodate the need for registered care identified in the SHMA that will now be delivered as specialist built homes. This gives a total requirement of **525 specialist built homes** over the plan period.

62. Of this, Adult Social Care's needs assessment concludes that 313 should be in the form of extra care. If the Council adheres to this barely any other form of care accommodation would be delivered and this would reduce the amount of choice available to the elderly, in direct conflict with the PPG therefore the Council will not use this as a target but will concentrate on delivering a wide range of choice over 476 specialist built homes. They can consist of extra care, sheltered housing, retirement living, age restricted housing and housing built to Part M of the Building Regulations M4(2) Optional Technical Standard.

Extra care housing

63. The need for extra care housing identified by Adult Social Care is still required as none have been delivered in the Purbeck area. Therefore the Council proposes removing the need for care homes from Policy H4: Moreton Station / Redbridge Pit and Policy H5: Wool and replacing this with two 65 unit extra care facilities instead. Providing this care within the allocated sites will enable the residents to be well connected to their communities and is in accordance with Adult Social Care's Building the Right Assets objective number 3.
64. It must be recognised that this type of housing can also be suitable for those with learning disabilities and long term mental health problems depending on the personal circumstances of the client (paragraph 9.44 SD21).
65. Additionally the Building Better Lives scheme in Purbeck plans on delivering a 65 unit extra care facility at Wareham.
66. The policy requirements and the Building Better Lives scheme would deliver **195 extra care homes** over the plan period.

Supported housing

67. To achieve the need for specialist housing, the Council will continue to expect some supported housing to provide for those without complex care needs such as retirement living, sheltered housing or age restricted housing.
68. Requiring this type of care on the larger allocations alongside the extra care facilities will ensure that as people's needs increase they will not need to move far to obtain more complex care. It is anticipated that this will be less disruptive to their lives and will support their continuing presence and engagement within the community for longer (pg, 8, Building the Right Assets).
69. Supported housing and extra care housing cannot practically be delivered on the smaller sites at Lytchett Matravers and Upton. This number of homes does not meet the threshold for provision of this kind without significantly limiting the number of mainstream market housing.
70. As the Building the Right Assets needs assessment shows there is a lot of sheltered housing in the Eastern Dorset Housing Market Area for the elderly, this requirement could potentially be lowered to 10% in the larger allocations and removed from Lytchett Matravers and Upton where it is impractical to deliver.

71. Both the land promoters and Adult Social Care supported this proposal.
72. This requirement would deliver **96 sheltered or retirement living homes** over the plan period.

Building Regulations Part M4(2) Optional Technical Standard

73. Adaptable and accessible homes will be suitable for the elderly or working-age adults with support needs. This type of housing will enable support to be given to people in their own homes through adaptation of properties, and will accommodate the rest of the need for specialist housing.
74. The current proposals require the allocations to provide 10% of their requirement as adaptable homes, however due to the reduction in sheltered housing on all sites, the Council proposes requiring the allocated sites to deliver 20% of homes as adaptable and accessible. This will help boost the supply of homes suitable for working age adults with long term health issues or learning disabilities as well as the elderly.
75. is requirement would deliver **240 accessible and adaptable homes** over the plan period.

Summary – how the Council will meet its need

76. The table below summarises the need identified by the Council.

Category	Nursing care	Extra care	Specialist purpose built (of which extra care is part)
Need identified	82	195	535

Table 4: Showing the need identified by the Council using updated demographics, evidence from the SHMA and Adult Social Care.

77. To ensure the Council can fully respond to changing needs over the plan period, and supported by The Retirement Consortium's comments, it is thought to be sensible to add that the Council will consider individual applications for care provision in consultation with Adult Social Care in areas considered to be sustainable.

78. As you can see from the table below, the altered requirements meet the needs identified in the SHMA and by Adult Social Care. As the Council is likely to meet the need identified without a deficit and as the Dorset Local Plan will aim to meet the need in its new plan, the requirements within the site specific policies can be aimed for rather than being a prescriptive requirement.

Site	Moreton Station / Redbridge Pit	Wool				Lytchett Matravers			Upton	Wareham Health Hub	Permissions granted since 2015	Total	Total registered care provision	% of registered care need met (need = 65)	Total specialist purpose built accommodation	% of need met (need = 539)
Site capacity	490	320	90	30	30	95	30	25	90							
Care home (C2)										69	13	82				
Extra care	65	65				n/a	n/a	n/a	n/a	65		195	82	100%	569	108%
Sheltered housing or age specific housing (@10%)	49	32	9	3	3	n/a	n/a	n/a	n/a	6		102				
M4(2) (@20%)	98	96	18	6	6	19	6	5	18			272				

Table 5: Showing how the much the changed policies will meet the Council's need for care provision

Single storey housing

79. As the requirement for single storey housing was potentially duplicating requirements for care on the allocated sites, this will no longer be required within the site specific allocations. However delivery on sites of 20 or more homes will help the Council achieve the need identified in the SHMA for specialist built accommodation for the elderly and disabled.

Policy H10: Part M of the Building Regulations

80. Though this policy should not apply to the allocated sites as they will deliver more than is required of this policy, this policy should remain as requiring this type of home on sites of 10 or more will again help the Council achieve the need identified in the SHMA for specialist built accommodation for the elderly and the disabled.

Affordable housing and care provision

81. The Council will aim to provide the same levels of affordable housing in supported housing as is expected for mainstream housing to ensure the houses are affordable.

Self-build and custom build requirements

82. As the number of people on the self-build register has reduced the self-build requirement within Policy H9: Housing Mix could be less prescriptive than is currently proposed and could be removed from within the site allocations where there is the possibility that too much would be delivered.

Proposed revision of Policies

83. The following revisions are proposed as part of the Purbeck Local Plan examination process. The revisions enable the Council to continue meeting the need for care provision whilst aligning itself with the aspirations of Adult Social Care and the PPG updates.

84. Further updates to the supporting text and some of the other policies that cross reference to the policies below will need to be made should these proposals be acceptable to the inspector.

Proposed policy modifications

Policy H4: Moreton Station / Redbridge Pit

Land at Moreton Station / Redbridge Pit and caravan site, as shown on the policies map, will help to meet the District's development needs by providing ~~up to~~ about 490 new homes, ~~a 65 unit extra care homes, bed care home,~~ community facilities and supporting infrastructure. ~~The type of care home provided will be dependent on the changing needs of older people in Purbeck and in consultation with local health and social care providers.~~ Delivery of the homes will be phased, commencing after the current use of part of the site as a sand and gravel pit has stopped (expected December 2022) and the site has been restored in accordance with the relevant minerals and waste planning permission.

Subject to the requirements of other policies in this plan, development on this site will be expected to:

- a. accommodate care designed in consultation with local health and social care providers to meet the changing needs of older people in Purbeck. The scheme should aim to provide:
 - I. 65 extra care homes; and
 - II. 10% of its overall housing requirement as supported housing for the elderly or age specific housing;
- b. provide 20% of its overall housing requirement in accordance with M4(2) building control optional standards to meet the needs of the elderly and the disabled as they occur;
- c. provide 350sqm of retail floor space;

...(policy continues as per PLP and associated modifications).

Policy H5: Wool

Land at Wool as shown on the policies map will help to meet the District's development needs by providing about a total of 470 new homes, a 65 bed care home, extra care homes, community facilities and supporting infrastructure. ~~The type of care provided will be dependent on the changing needs of older people in Purbeck and in consultation with local health and social care providers.~~ Housing development on all the allocated sites in Wool will be expected to:

- a. accommodate care designed in consultation with local health and social care providers to meet the changing needs of older people in Purbeck. The scheme should aim to provide:
 - I. 65 extra care homes; and
 - II. 10% of its overall housing requirement as supported housing for the elderly or age specific housing;
- b. provide 20% of its overall housing requirement in accordance with M4(2) building control optional standards to meet the needs of the elderly and the disabled as they occur;
- c. provide 350sqm of retail space;
- d. provide contributions towards improvements at the D'Urberville Hall community facility;

...(policy continues as per PLP and associated modifications)...

Land to the west of Chalk Pit Lane and Oakdene Road

Land as shown on the policies map will help to meet the District's housing needs by providing up to 320 new homes, ~~a 65 bed care home, community facilities~~ extra care homes and infrastructure. Subject to the requirements of other policies in this plan, development on this site will be expected to;

...(policy continues as per PLP and associated modifications).

Policy H6: Lytchett Matravers

Land as shown on the policies map will help to meet the District's housing needs by providing ~~up to~~ about 95 new homes on Land to the East of Wareham Road, 25 homes on Land at Blaney's Corner and 30 homes on land to the East of Flowers Drove as well as supporting infrastructure

and community facilities. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development on all the allocated sites in Lytchett Matravers will be expected to:

- a. provide 20% of its overall housing requirement in accordance with M4(2) building control optional standards to meet the needs of the elderly and the disabled as they occur;

...(policy continues as per PLP and associated modifications).

Policy H7: Upton

Land at Upton, as shown on the policies map, will help to meet the district's housing needs by providing ~~up to~~ about 90 new homes, community facilities and infrastructure. Subject to the requirements relating to all development on the sites allocated for new homes in this plan, housing development on the allocated site at Upton will be expected to:

- a. provide 20% of its overall housing requirement in accordance with M4(2) building control optional standards to meet the needs of the elderly and the disabled as they occur;

...(policy continues as per PLP and associated modifications).

Policy H9: Housing Mix

In order to achieve mixed and balanced communities, the Council will generally expect new market housing to support delivery of the household requirements identified through the Strategic Housing Market Assessment

With the exception of the site allocations in this plan, ~~For sites delivering 20 or more units, development proposals will be encouraged to provide will be permitted where of the proposed market homes:~~

- a. ~~5% are offered for sale as~~ 5% ~~are offered~~ for sale as self-build plots. Such plots must be provided with a means of access and utility services to the boundaries of the plot; and
- b. ~~40% are~~ 10% ~~are~~ as single storey homes.

~~For the identified housing allocations in the Purbeck Local Plan, the Council will expect 20% of the market and affordable housing mix to provide specialist purpose built accommodation, for the elderly. Where such provision would provide a single storey home this would contribute to the above requirement at criterion b.~~

As part of ensuring a wide mix of accommodation to meet the needs of Purbeck's population, proposals for ~~institutional housing (Use Class C2) such as~~ care ~~homes~~ provision for the elderly or the disabled will be supported ~~both~~ through individual developments at appropriate locations in

accordance with the settlement hierarchy and in consultation with local health and social care providers. ~~Policy V1: Spatial Strategy for sustainable communities and at allocated sites...~~

Policy H10: Part M of the Building Regulations

~~To ensure the provision of homes that are capable of meeting the needs of residents both now and in the future, Building Regulations requirement M4(1): Visitable homes, will be applied unless to do so would be inconsistent with planning policies which protect assets or areas of particular importance.~~ With the exception of the site allocations in this plan, ~~T~~the following will apply on sites of 10 or more homes or site area greater than 0.5 hectares:

10% of the new homes proposed must meet the Building Regulation optional requirement M4(2): 'Category 2 – accessible and adaptable homes' (where this calculation gives part of a new home the Council expects the proportion to be rounded up, or down, to the nearest whole number ~~one decimal place~~).

Policy H11: Affordable Housing

When determining planning applications for all new residential development, including residential elements of mixed use schemes, unless specifically stated as a requirement in the allocation of the site, but excluding extra care homes. Affordable housing will be required as follows:

...(policy continues as per PLP and associated modifications).

Glossary

Extra care: Purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Occupants have specific tenure rights. Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. The intention is for residents to benefit from varying levels of care as need requires.

Age specific housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

Supported housing for the elderly: (Retirement living or sheltered housing) This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some

support to enable residents to live independently. This can include 24 hour on-site assistance through an alarm, warden or telecare system.

Accessible and adaptable homes: as per Optional Technical Housing Standard M4(2) Category 2: Accessible and adaptable dwellings.

Appendix A: POPPI statistics

Predicted population increase in the over 65's

Data for: Purbeck

Table produced on 23/09/19 15:04 from www.poppi.org.uk

version 11

Population aged 65 and over, projected to 2035

	2019	2020	2025	2030	2035	Change	Percentage
People aged 65-69	3,400	3,300	3,600	4,100	4,100	700	20.6
People aged 70-74	3,600	3,700	3,200	3,500	4,000	400	11.1
People aged 75-79	2,500	2,700	3,300	3,000	3,300	800	32.0
People aged 80-84	1,700	1,800	2,200	2,800	2,500	800	47.1
People aged 85-89	1,100	1,100	1,200	1,500	1,900	800	72.7
People aged 90 and over	600	600	700	800	1,000	400	66.7
Total population 65 and over	12,900	13,200	14,200	15,700	16,800	3,900	30.2

Figures may not sum due to rounding. Crown copyright 2018

Figures are taken from Office for National Statistics (ONS) subnational population projections by persons, males and females, by single year of age. The latest subnational population projections available for England, published 24 May 2018, are full 2016-based and project forward the population from 2016 to 2041.

Long-term subnational population projections are an indication of the future trends in population by age and sex over the next 25 years. They are trend-based projections, which means assumptions for future levels of births, deaths and migration are based on observed levels mainly over the previous five years. They show what the population will be if recent trends continue.

The projections do not take into account any policy changes that have not yet occurred, nor those that have not yet had an impact on observed trends.

Dementia statistics

Data for: Purbeck

Table produced on 23/09/19 15:14 from www.poppi.org.uk version 11

People aged 65 and over predicted to have dementia, by age and gender, projected to 2035

	2019	2020	2025	2030	2035	Increase	Percentage increase
People aged 65-69	56	56	60	68	68	12	21.4
People aged 70-74	110	110	98	107	122	12	10.9
People aged 75-79	149	161	197	180	197	48	32.2
People aged 80-84	188	188	242	309	276	88	46.8
People aged 85-89	217	217	217	267	358	141	65.0
People aged 90 and over	189	189	212	248	306	117	61.9
Total population aged 65 and over	909	921	1,025	1,179	1,327	418	46.0

Figures may not sum due to rounding. Crown copyright 2018

SD115: Planning the care provision for the Purbeck area

Rates for men and women with dementia are as follows:

Age range	% males	% females
65-69	1.5	1.8
70-74	3.1	3
75-79	5.3	6.6
80-85	10.3	11.7
85-89	15.1	20.2
90-94	22.6	33
95+	28.8	44.2

Figures are taken from Dementia UK: Update (2014) prepared by King's College London and the London School of Economics for the Alzheimer's Society. & This report updates the Dementia UK (2007) report. It provides a synthesis of best available evidence for the current cost and prevalence of dementia. It aims to provide an accurate understanding of dementia prevalence and cost in the UK to assist in policy development, influencing, commissioning and service design.

The prevalence rates have been applied to ONS population projections of the 65 and over population to give estimated numbers of people predicted to have dementia to 2035.

To calculate the prevalence rates for the 90+ population, rates from the research for the 90-94 and 95+ age groups have been applied to the England population 2013 (when the research was undertaken) to calculate the numbers in each age group, the sum of these groups is then expressed as a percentage of the total 90+ population to establish the predicted prevalence of the 90+ population as a whole.

Mobility statistics

Data for: Purbeck

Table produced on 23/09/19 15:42 from www.poppi.org.uk version 11

People aged 65 and over unable to manage at least one mobility activity on their own, by age and gender, projected to 2035. Activities include: going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed

	2019	2020	2025	2030	2035	Increase	Percentage increase
People aged 65-69	290	290	307	349	349	59	20.3
People aged 70-74	474	474	422	458	520	46	9.7
People aged 75-79	417	450	549	504	549	132	31.7
People aged 80-84	405	405	517	669	593	188	46.4
People aged 85 and over	795	795	830	1000	1255	460	57.9
Total population aged 65 and over	2381	2414	2625	2980	3266	885	37.2

Figures may not sum due to rounding. Crown copyright 2018

Rates for those who are unable to manage at least one of the mobility tasks listed are as follows:

Age range	% males	% females
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65-69	8	9
70-74	10	16
75-79	12	21
80-84	18	29
85+	35	50

Figures are taken from Living in Britain Survey (2001), table 29.

The prevalence rates have been applied to ONS population projections of the 65 and over population to give estimated numbers predicted to be unable to manage at least one of the mobility tasks listed, to 2035.

Appendix B: PANSI statistics

Data for: Purbeck

Table produced on 23/09/19 15:12 from www.pansi.org.uk version 11

Population aged 18-64, projected to 2035

	2019	2020	2025	2030	2035
People aged 18-24	0	-3%	0%	7%	7%
People aged 25-34	0	-2%	-5%	-9%	-7%
People aged 35-44	0	0	2%	2%	0%
People aged 45-54	0	-3%	-13%	-16%	-14%
People aged 55-64	0	1%	6%	1%	-8%
Total population aged 18-64	0	-1%	-2%	-4%	-6%
Total population - all ages	0	0%	2%	3%	5%

Figures may not sum due to rounding. Crown copyright 2018

Figures are taken from Office for National Statistics (ONS) subnational population projections by persons, males and females, by single year of age. The latest subnational population projections available for England, published 24 May 2018, are full 2016-based and project forward the population from 2016 to 2041.

Long-term subnational population projections are an indication of the future trends in population by age and sex over the next 25 years. They are trend-based projections, which means assumptions for future levels of births, deaths and migration are based on observed levels mainly over the previous five years. They show what the population will be if recent trends continue.

The projections do not take into account any policy changes that have not yet occurred, nor those that have not yet had an impact on observed trends.

Appendix C: Comments received from land promoters and The Retirement Consortium

Martin Miller, Terence O'Rourke, Moreton Station / Redbridge Pit

In an email dated 25 September 2019.

'Dear Frances

Thanks for your email. Having discussed the document and your email with our client and other members of our team, we would offer you the following comments and observations.

We support the removal of the requirement to provide land for self-build units and for single storey housing under your suggested changes to policy H9

Policy H9 requires allocated sites to provide 20% of the market and affordable housing mix as “specialist purpose built accommodation for the elderly”. We have always assumed that this required the future developer of our client’s site to ensure that 98 units are built so that they are capable of being accommodated by elderly people, rather than requiring 98 units to comprise purpose-built age-restricted housing or sheltered housing. If the council means the latter, then policy H9 should be reworded so that this is explicitly clear.

Due to the low value nature of properties in Moreton Station, we doubt that our client’s site will be particularly attractive to commercial operators of retirement housing or sheltered housing. For this reason, we welcome the proposed reduction in the percentage requirement of purpose built accommodation for the elderly from 20% to 10%, albeit we cannot see why we cannot have 0% in light of our comments in point 4 below.

We have no objection to the requirement for 20% of the proposed housing units to be built to comply with M4(2) Category 2 requirements. As compliance with this requirement will actually future proof 98 housing units so that they can be occupied by older and/or disabled people in the future, we would suggest that this measure alone will (on its own) meet the policy requirement for 20% of dwellings to provide “specialist purpose built accommodation for the elderly”.

Within your definitions of care, we would suggest that you make it clear that extra care units fall within class C2 of the Use Classes Order.

Within your definitions of care, retirement housing is capable of being occupied by people who do not require any care at all, and sheltered housing is housing where there is access to a warden, but no care is provided on site. We therefore suggest that both have their own definitions and that both are removed from a table that is headed “definitions of care”.

We do not agree with the second paragraph of text under the definition of Building Regulation Optional Requirement M4(2) as we can find no reference to this within the Building Regulations. We suggest that this text is deleted.’

Andrew Fido, Savills on behalf of land owners at Wool Landowners: Lulworth Estate, Redwood Properties and Mr Andrew Jackson

In an email dated 25 September 2019

‘Dear Frances, Thank you for the opportunity to comment and also the viability meeting with your colleague Sue on the 20th of September 2019. While we appreciate you have tabled a number of options for revising the elderly persons housing policies it difficult for us to confirm our policy preference without seeing the additional viability analysis to be undertaken by DSP. Extra Care in particular will need to be subject to viability modelling to understand any potential impact on scheme residual land value. We appreciate this will not be a simple task given the diverse range of products on offer. This is why the NPPG stresses flexibility when it comes to elderly persons accommodation as we discuss below. As we also discussed at our meeting with Sue, and in our previous written representations, key viability inputs such as external works should be included in the revised appraisals and we continue to question the use of the lowest Greenfield BLV we have experienced. It must be remembered that affordable housing under the new NPPG must set policy targets at deliverable levels at the plan making stage. Once external works is added at 10% of base build costs, and a more reasonable BLV applied, 30% Affordable Housing is considered

achievable. With respect to PLP policy H9 and H10, and particularly in respect of elderly persons accommodation, we are able to respond as follows. In short, we welcome the following changes:

- removal of the current H9 policy requirement to provide single storey properties;
- removal of the current H9 policy requirement to provide self-build properties;
- the principle of relocating the H9 and H10 policy relating to elderly persons accommodation and M4(2) accessible and adaptable dwellings to the site-specific policy H5 Wool, although noting our concerns as set out below that these should be aspirations rather than requirements; and
- the retention of a ‘viability clause’ within policy H5, which would extend to include elderly persons accommodation and M4(2) accessible and adaptable dwellings

In order to accord with Government policy and be found sound, the PLP should only be setting flexible policy aspirations for housing for older and disabled people rather than strict policy requirements. On this point the NPPG section entitled ‘*Housing for older and disabled people*’, published as recently as June 2019, is clear that in addressing the housing needs of older people plan making authorities ‘*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*’ (Para 006 Reference ID: 63-006-20190626). We also note that the Planning Practice Guidance confirms that the provision of ‘housing for older people’ is one of the circumstances that would justify a viability assessment at the application stage (para 015 Reference ID: 63-015-20190626), again emphasising the need for flexibility. In line with the above overarching points, we have the following concerns regarding the proscriptive nature of the policies, their practicality of delivery and their viability. Affordable housing mix Dorset Council are proposing that that affordable housing mix for all types of care provision should accord with policy H11, i.e. 40% of provision to be affordable.

Notwithstanding our wider viability objections, it is also important that a cautious and flexible approach is adopted for this issue as the provision of elderly persons accommodation is ‘bespoke’ to the site specifics. We are mindful of the response that Dorset Council has already received from the ‘Retirement Housing Consortium’ through the PLP Examination which cites that a maximum of a 10% affordable housing contribution is all that these types of development can support. Above all we seek a high degree of flexibility in policy application as this is paramount to enabling delivery ‘on the ground’. **Thus the final policy wording should be phrased using the terms: ‘target’ or ‘aim to provide’ and ‘subject to a viability assessment’ rather than required’. The final target also needs to be informed by the additional viability testing to be undertaken by DSP.** Dorset Council Site Specific Options for the provision of Elderly Persons Accommodation. We have grouped the Dorset Council proposed options in the summary table below.

<p>Dorset Council: Option Reference</p>	<p>Accessible and Adaptable Dwellings (M4(2)) BC standard (as percentage of overall requirement)) step free access (curtilage, WC private outdoor space,- wheelchair circulation space -car space width etc</p>	<p>Retirement/sheltered housing Designed to meet the needs of those who wish to downsize to a smaller property with less upkeep, freeing up larger properties for families etc. Typically consists of schemes of around 30 units, they should provide access to an alarm system or telecare for assistance when needed, communal areas will be encouraged. This type of accommodation can be delivered by a Registered Provider or an alternative</p>	<p>Extra Care units Designed as an alternative to traditional nursing care homes, extra care aims to meet the needs of the elderly and where appropriate, the disabled without complex needs. The residents will need visiting support or a lower level of on-site care. Typically consists of around 60 units, each comprising of a self - contained</p>	<p>Nursing care (residential home) Designed to meet the needs of those with complex care needs, for instance, those with dementia. Typically consists of one building with around 60 separate bedrooms and communal facilities with nursing or residential care 24 hours a day.</p>
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			dwelling suitable for 24 hour non-complex personal care where required. Occupants have specific tenure rights and residents are not obliged to obtain their care services from a specific provider.	
1 CURRENT	10% (47 units)	20% (94 units)	65 units (i.e. 65 units additional to 470 allocation)	0 units
2	20% (94 units)	20% (94 units)	0 units (i.e. zero units additional to 470 allocation)	0 units
3	20% (94 units)	10% (47 units)	65 units (i.e. 65 units additional to 470 allocation)	0 units

Our response can be summarised as follows: Whilst we welcome the fact that DC are reviewing this issue and seeking to provide greater clarification and certainty; these options need to be informed by the additional viability testing to be undertaken by DSP. Our initial view, which may change after reviewing the additional DSP modelling, is that option 3 appears to represent a step forward on the basis that the proportion of adaptable buildings is 'maximised' and the provision of retirement/sheltered housing is 'minimised', whilst the provision of a care home is maintained. However we would need sight of your viability assessment having pre-agreed relevant comparables, to confirm that position. In the absence of this detail our remaining concerns are:

- application of the percentage target to the Wool allocation of 470 houses produces a required number of units (either 47 or 94 depending on the % rate) that appears random and not focussed on what the market seeks to provide. Greater flexibility is therefore needed;
- it is not clear whether the percentage target would apply to each of the component land parcels at Wool. Given their respective sizes and capacity our preference is that any provision is made on the larger component land parcels, notably 'north east of Burton Cross roundabout' and 'land to the west of Chalk Pit Lane and Oakdene Road'. Greater flexibility is therefore needed;
- we would have less practicality, deliverability and viability concerns if the categories were not mutually exclusive; i.e. the accessible and adaptable provision could count towards the retirement/sheltered provision and vice versa;

The definitions of care are too proscriptive and do not accord with those stated at para 10 of the Planning Practice Guidance 'Housing for older and disabled people' (June 2019). In summary our comments are as follows, with a comparison table provided overleaf:

The PPG includes 'age restricted housing' but there is no reference in your document to that type of provision;

The 'nursing care/residential home' definition should accord with the Planning Practice Guidance 'Housing for older and disabled people' definition at para 10. The reference to 60 units is unhelpful;

The 'extra care housing or housing with care' definition should accord with the Planning Practice Guidance 'Housing for older and disabled people' definition at para 10. The reference to 60 units is unhelpful;

The 'retirement housing or sheltered housing' definition should accord with the Planning Practice Guidance 'Housing for older and disabled people' definition at para 10. The reference to 30 units is unhelpful, and the reference to an alarm system or telecare is a 'could' rather than a 'should'; and

The 'accessible and adaptable dwellings M4(2) definition' should accord with the Planning Practice Guidance 'Housing for older and disabled people' definition at para 8. The reference to groupings of 6 units is unhelpful.

Nursing care (residential home)

Dorset Council Definition: Designed to meet the needs of those with complex care needs, for instance, those with dementia. Typically consists of one building with around 60 separate bedrooms and communal facilities with nursing or residential care 24 hours a day.

PPG definition: Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Extra Care units

Dorset Council definition: Designed as an alternative to traditional nursing care homes, extra care aims to meet the needs of the elderly and where appropriate, the disabled without complex needs. The residents will need visiting support or a lower level of on-site care. Typically consists of around 60 units, each comprising of a self-contained dwelling suitable for 24 hour non-complex personal care where required. Occupants have specific tenure rights and residents are not obliged to obtain their care services from a specific provider.

PPG definition: Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses

Retirement/sheltered housing

Dorset Council definition: Designed to meet the needs of those who wish to downsize to a smaller property with less upkeep, freeing up larger properties for families etc. Typically consists of schemes of around 30 units, they should provide access to an alarm system or telecare for assistance when needed, communal areas will be encouraged. This type of accommodation can be delivered by a Registered Provider or an alternative.

PPG definition: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

Accessible and Adaptable Dwellings

Dorset Council definition: Designed to meet the needs of those requiring supported living or to allow homes to adapt to specific needs as they arise. Typically consists of groups of no more than 6 units in close proximity to one another, integration with mainstream housing is encouraged.

PPG definition: Accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs. Where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)

M4(2) Category 2: Accessible and adaptable dwellings

M4(3) Category 3: Wheelchair user dwellings

Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.

Overall we would emphasise the need for flexibility in setting policy objectives, and that these must be stated as aspirations rather than requirements. If that can be achieved, then that would be a significant positive step forward which would allow us to review our position on viability and affordable housing provision.'

Peter Home, Turley on behalf of Wyatt Homes, Lytchett Matravers and Upton.

In an email dated 25 September 2019

Introduction

In an email of 18th September 2019, Frances Summers (Senior Planning Policy Officer at Dorset Council) requested comments on a short note that was attached to the email. This note sets out the Council's suggested way forward in relation to the aspects of the Purbeck Local Plan (PLP) that cover the requirements on the provision of care facilities and accommodation for the elderly and disabled.

The comments that follow are made to Dorset Council on behalf of Wyatt Homes (Respondent: 1190024). These comments have also been informed by informal discussions with the planning agents representing the landowners of the other strategic site allocations within the PLP.

These comments should be read alongside the following previous representations and statements provided on behalf of Wyatt Homes:

- Representations to the Pre-Submission Version of the PLP (December 2018);
- Examination Hearing Statement on Matter A: Housing (June 2019);
- Response to the Examination on the Council's Additional Evidence Documents (September 2019); and
- The Letter from Turley to Dixon Searle Partnership on development viability issues (September 2019)

This letter was copied to Dorset Council Planning Policy Officers and was sent separately to Ms Summers.

Comments on the Council's Note

The Summary Changes Proposed

The note starts by setting out a summary list of proposed changes to the PLP. We provide comments on these in turn.

Removal of Policy H9 (therefore removal of self-build requirements and single storey housing)

We support this approach. We have previously made representations explaining why we have a range of concerns about the way in which Policy H9 was framed. This proposed approach would certainly move towards addressing these concerns, at least as far as they relate to the proposed requirements for 'self-build plots' and 'single storey dwellings'.

Keeping Policy H10 but where M4(2) is specified in the site specific policies policy H10 will not apply

Again, we support this approach. It is important to consider the range of requirements together so that the potential relationship between the various requirements is clear. The current approach of splitting these between Policies H9, H10 and the site allocations policies does not achieve this clarity.

Site specific requirements to fulfil care provision as set out below will be placed into the site specific policies H4, H5, H6 and H7

We also support this approach in principle, although we have commented separately below on the three options set out and we remain of the view that a requirement for on-site care provision would impact on the deliverability and viability of policies H6 and H7. However, subject to our remaining concerns on these options, the approach of placing these requirements within the site allocation policies is supported.

Viability clause within site specific policies will remain

We support this approach. Indeed we consider that this approach is required to ensure that the site allocations policies remain consistent with the PPG on viability and deliverability.

The affordable housing mix for all types of care provision will be the same as Policy H11. On the proposed allocated sites we require 40% of the homes delivered to be affordable

We have no immediate concerns about the overall proposed target for affordable housing at the allocated sites, subject to viability at the detailed planning application stage. However, we remain concerned about the application of prescriptive targets for specialist accommodation for the elderly to be provided as affordable homes. Whether or not this is deliverable will depend on the ability to find a suitable registered provider to take on these dwellings at each site. This in turn will depend on a range of factors, including the location and nature of the developments sites and the number of affordable units being offered.

Whilst the overall affordable homes target for the proposed allocated sites could remain at 40%, we consider that the extent to which any units of specialist accommodation delivered constitute affordable homes should be a matter for the detailed planning applications. This change would allow for increased local plan flexibility and improve the certainty of delivery of the types of development sought. We accept that the Council may wish to *encourage* the delivery of a portion of specialist accommodation units to be delivered as affordable homes, but this should not be prescriptive or framed as 'a requirement'.

The Three Options

The options presented set out three types of accommodation that may be required from the allocated sites, at varying levels. These comprise:

- Extra care facilities
- Retirement/sheltered housing
- M4(2) Enhanced Building Regulations

As an initial comment, we are disappointed to see that Lytchett Matravers has been treated within the three options as a single site. As we have repeatedly sought to emphasise, there are three separate residential

allocations proposed at Lytchett Matravers. The proposed capacity of these is 25, 30 and 95 dwellings respectively. It is not appropriate for the PLP to consider the requirements as if they applied to a single site of 150 units. Such a site would no doubt have different viability and deliverability characteristics than is the case with three separate sites.

Option 1

Option 1 provides for the '*status quo*' and simply moves the current requirements of Policies H9 and H10 to the site allocation policies. We cannot support this option for the reasons we have set out in our previous representations and statements. We do not consider that achieving 20% of dwellings as retirement / sheltered housing on the three sites at Lytchett Matravers or the site at Upton will be viable or deliverable. We also consider that achieving the form of specialist accommodation envisaged by the Council brings a range of practical challenges that would need to be resolved. This in turn could further impact the viability and deliverability of the four schemes involved. Please see in particular the comments made on this within our letter to Dixon Searle Partnership earlier in September.

Option 2

In relation to Lytchett Matravers and Upton, Option 2 is worse than Option 1. This option continues to seek 20% of homes to be delivered as retirement/sheltered housing, but also expects an increased proportion of 20% of homes to be delivered to enhanced Building Regulations.

Whilst it is not clear from the Council's note, this option appears to suggest that the two requirements could potentially overlap, such that 20% of dwellings could be provided to meet both the requirement for retirement/sheltered and the enhanced Building Regulations. Whilst that would be a step forward (if it were confirmed to be the case) it would not resolve the fundamental concerns we have about how retirement/sheltered dwellings can be practically and viably delivered on the small and medium sized allocation sites in which Wyatt Homes has an interest.

For the avoidance of doubt, we do not support Option 2.

Option 3

Option 3 does provide for some improvement over the other options as it recognises that the site allocation at Upton should not need to provide retirement/sheltered units. However, this option retains a requirement for 10% of dwellings to be delivered as retirement/sheltered at Lytchett Matravers. We find this hard to understand given that two of the three sites at Lytchett Matravers are significantly smaller than the Upton site, whilst the third site (Land East of Wareham Road) has a capacity only fractionally larger than the Upton site.

It remains unclear whether the Council is proposing that 10% of dwellings at each site should be delivered as retirement/sheltered or if this should be provided only on the largest site at the level of 10% of the total number of homes anticipated at Lytchett Matravers. Either way, it is clear that this would fail to achieve any viable retirement/sheltered scheme, based on the Council's own proposed definition, which refers to these sorts of schemes typically consisting of around 30 units. By contrast, under Option 3, the maximum level of provision would be 15 units, even if these were all delivered on a single site rather than being split between the three proposed sites at Lytchett Matravers.

Reflecting the above points, in addition to these we have made previously, we cannot support Option 3 as currently drafted. However, if this option were to be revised to propose no retirement/sheltered at both Upton and Lytchett Matravers, but with 20% enhanced Building Regulations expected, Wyatt Homes would be able to support this as an approach. This revised version of Option 3 would still provide for a valuable contribution in terms of the supply of adapted and accessible homes for the elderly and disabled in Purbeck.

Additional statements to be included in the policies

We are content with the addition of an expectation that applicants will consult with Dorset Adult Social Care prior to the submission of a detailed planning application on sites where care provision is required.
Definitions of care

We note the definitions presented and have the following comments to make.

Age-restricted market housing

First, we consider that not all of the appropriate types of provision for the elderly and disabled have been defined. The PPG sets out a range of definitions for different types of specialist housing which includes 'Age-restricted market housing', which does not appear to have been considered by the Council. We believe that in order to be consistent with the PPG, the Council should recognise and allow for 'Age-restricted market housing' as a form of specialist housing for older people.

Retirement/sheltered housing

We broadly support the definition proposed. However, this definition (which is similar to the definition of 'Retirement living or sheltered housing' within the PPG) does emphasise the need for delivered schemes to be of a sufficient scale to achieve the specialist support facilities, such as the alarm/telecare system or warden support. We agree that to have any realistic chance of being viable, such schemes would need to comprise about 30 units or more of these sorts of accommodation.

Building Regulation Optional Requirement M4(2)

Whilst we don't have any particular issues with the proposed definition, we do consider that it would be preferable to align the definition more closely with that of 'Accessible and adaptable housing' within the PPG. The PPG sets out a wider range of benefits for this type of housing than are included within the Council's definition. We consider that the benefits of providing a significant portion of homes (whether 10% or 20%) as accessible and adaptable housing should not be underplayed and would represent a major contribution to meeting the needs of those whose needs are not met by general purpose housing.

Memorandum of Understanding

The email of 18th September sought support for a potential Memorandum of Understanding (MoU) to be signed with the Council on the proposed way forward. Whilst Wyatt Homes wish to remain positively engaged in assisting the Council and the Independent Examination of the Local Plan to find an appropriate way forward, we do not consider that the current framing of the options within the Council's note provides a sufficient basis for agreeing an MoU.

We request that the Council considers the points we have made above, alongside our previous representations and statements, and revises the options (particularly Option 3) in the way in which we have outlined above. If that approach is acceptable to the Council, we confirm that Wyatt Homes would be willing to sign an appropriately worded MoU to be submitted to the Inspector.'

Followed by email received 3 October 2019

'As I previously indicated, Wyatt Homes supports all of the proposed changes to policies H6, H7, H9 and H10 and we support the justification that you have provided for the changes proposed'.

Carla Fulgoni, on behalf of The Retirement Consortium

In an email dated 25 September 2019

'Dear Frances,

Thank you for your email to my colleague Alex Child. The members of the Retirement Housing Consortium have discussed your suggested changes to the policies and have the following comments which I'd be happy to discuss with you in further detail if it would be helpful.

In terms of the three different options for site allocations we would suggest that option 1 which delivers a 20% mix of sheltered or retirement housing on all schemes would be preferable as it is clear that there is a housing need to be addressed. If this causes viability issues, this is dealt with elsewhere in the Plan.

We would strongly maintain that policy H9 should remain as a policy to promote housing for older people in line with the new national planning policy guidance. As the June 2019 update to the PPG introduces a new section entitled '*Housing for older and disabled people*' which places an emphasis upon the '**critical**' need to provide housing for older people. In a sub-section entitled '*Why is it important to plan for the housing needs of older people?*' (Paragraph: 001 Reference ID: 63-001-20190626 Revision date: 26 June 2019) it states:

"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking."

It continues in the Paragraph 006 Reference ID: 63-006-20190626 '*How can the housing requirements of particular groups of people be addressed in plans?*'

'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 the 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.'

It also includes the Paragraph 016 Reference ID: 63-016-20190626 '*What factors should decision makers consider when assessing planning applications for specialist housing for older people?*'

'Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.' (my emphasis).

It is therefore appropriate for the Council to plan pro-actively for the provision of housing for older people. It would not be possible to properly plan for housing for older people by planning exclusively for this provision to be provided on only allocated sites. Most of the sites where the members of the retirement housing consortium develop are land assemblies or brownfield sites within 0.5 miles of town and village centres. In order to meet the critical need for housing for older people a standalone policy is required. To rely on a site allocations policy and 'care provision' without the consideration of specialist accommodation for older people would not be appropriate.

We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation. We would like to highlight the advice provided in the *Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit*. This toolkit was developed by a consortium of private and public organisations with an interest in housing for the elderly and encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. I can provide a copy of this document if it would be helpful to you. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.

The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."

I would also note that the application of affordable housing policies to Extra Care accommodation would not be appropriate. It is therefore considered that the policy include the following sentence: "All C3 Use Class homes will be required to provide affordable housing (including retirement properties but excluding Extra Care Accommodation which is Use Class C2)"

Finally, the definitions of care section as currently drafted are inappropriate. We would suggest that these definitions are replaced with the definitions found within the PPG.

Kind regards,

Carla Fulgoni on behalf of the retirement housing consortium'.

And in an email received on 3 October 2019

Good afternoon Frances,

Thank you for your email. It is good to hear that our comments are being considered by the council, and we look forward to receiving the proposed changes. In relation to your questions on the scale of the developments:

- Age restricted general market housing can come in a variety of sizes and the size is generally dependent on the level of communal facilities provided.
- Similarly, depending on the level of communal facilities, Retirement / Sheltered housing can also be delivered with schemes of 25- 40 dwellings but a typical scheme size is around 35 units.
- Extra care developments require a minimum size of 50+ units.

As ever, feel free to let me know if you have any further questions.

Kind regards'