
Basingstoke and Deane Borough Local Plan Examination in Public

Hearing Statement on behalf of
The Fogarty Group Ltd.

Issue 3: Spatial Strategy and Housing
Need

September 2015

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Issue 3: Spatial Strategy and Housing Need

Representations on behalf of The Fogarty Group Ltd.

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1.0 INTRODUCTION

1.1 This Statement is submitted to the Basingstoke and Deane Borough Local Plan Examination in Public on behalf of The Fogarty Group Ltd.

1.2 These statements refer to the following Issues, identified by the Inspector in his Final Matters:

- Issue 3: Spatial Strategy & Housing Need

2.0 ISSUE 3: SPATIAL STRATEGY AND HOUSING NEED (Q4.8 - 4.13)

Question 4.9

Regarding policy CN4, is the provision of specialist housing (e.g. housing for the elderly, disabled and students) a strategic matter for Basingstoke?

2.1 Yes, the provision of specialist housing for the elderly is a strategic matter for the Borough, as this Statement will demonstrate.

Providing Housing for the Elderly - the National Picture

2.2 At a national level, acknowledging the accommodation needs of the country's ageing population has been high on the Government's agenda. In 2011 the Government's publication 'Laying the Foundations: A Housing Strategy for England' covered a wider spectrum of housing matters, but included a clear focus on providing housing for older people through a variety of steps, with a clear focus on helping people to stay independent should they wish to and have access to the support they need.

2.3 The Demos report entitled 'The Top of the Ladder' published in September 2012 set out the general context on the need to provide housing for the elderly and the impacts that doing so might have on the wider housing market. The Demos report established that:

- One in four (25 per cent) over 60s would be interested in buying a retirement property – equating to 3.5 million people nationally.
- The figures show that 33 per cent of over 60s want to downsize, which equates to 4.6 million over 60s nationally.
- More than four in five (83 per cent) of the over 60s living in England (i.e. excluding Scotland, Wales or Northern Ireland) own their own homes, and 64 per cent own their own home without a mortgage.
- This equates to £1.28 trillion in housing wealth, of which £1.23 trillion is unmortgaged. This is far more than the amount of savings this group has (£769 billion).
- Therefore the over 60s interested in downsizing specifically are sitting on £400 billion of housing wealth.

- If just half of the 58 per cent of over 60s interested in moving (downsizing and otherwise) as reported in our survey were able to move, this would release around £356 billion worth of (mainly family-sized) property – with nearly half being three-bedroom and 20 per cent being four bedroom housing.
- If those wanting to buy a retirement property were able to do so, this would release £307 billion worth of housing.
- If just half of those interested in downsizing were able to do so, 4 million older people would be able to move freeing up 3.5 million homes.

2.4 From a planning policy perspective the issue of the ageing population is acknowledged through the National Planning Policy Framework, particularly Paragraph 47 and 50, but the core policy is within the Planning Practice Guidance.

2.5 In respect of housing need assessments the PPG states the following:

“Once an overall housing figure has been identified, plan makers will need to break this down by tenure, household type (singles, couples and families) and household size. Plan makers should therefore examine current and future trends of:

- **the proportion of the population of different age profile;**
- **the types of household (eg singles, couples, families by age group, numbers of children and dependents);**
- **the current housing stock size of dwellings (eg one, two+ bedrooms);**
- **the tenure composition of housing.**

This information should be drawn together to understand how age profile and household mix relate to each other, and how this may change in the future.”¹

2.6 The PPG also states the following in respect of delivering housing for older people:

“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). The age profile of the population can be drawn from Census data. Projection of population and households by age group should also be used.”²

¹ Paragraph: 021 Reference ID: 2a-021-20150326, How should the needs for all types of housing be addressed?, Planning Practice Guidance, 06 March 2014 (revised 26 March 2015)

² Ibid

- 2.7 Britain's well documented ageing population is further reinforced by the latest annual mid-year population estimates (2014) published by ONS.
- 2.8 Published in June 2015, the report estimates a rise in the median age of the population to 40 years old - the highest ever estimated – as the number and therefore proportion of older people continues to rise, up 0.3% in a year.
- 2.9 The property industry has been aware of this trend for a number of years and we are now beginning to see a response in delivery, with the National House Building Council (NHBC) reporting there were more retirement properties registered in England in the first half of 2015 than there were throughout the whole of 2014. Of course this information comes at a time when the overall level of housebuilding exceeds that of 2014, but it is nevertheless encouraging.

Providing Housing for the Elderly - the Local Picture

- 2.10 At the local level, the acknowledgement at paragraph 5.30 of the Submission Local Plan that the number of elderly living in the Borough is expected to continue to increase over the Plan period as people are living longer is welcomed and it is encouraging that the Council acknowledge that a specific policy should be included in order to plan for housing for older people.
- 2.11 The acute need for elderly person's accommodation is exemplified in the latest 2012 sub-national projection projections, anticipating that Basingstoke and Deane will experience a 97% increase of population aged 65+ between 2012 and 2037. Of all the local authorities in England, Basingstoke & Deane is expected to experience the 8th greatest percentage increase in population aged over 65.
- 2.12 In principle, the Fogarty Group Ltd welcome the inclusion of Policy CN4 (Housing for Older People/Specialist Housing) within the submission Local Plan. However, as demonstrated in previous representations the Council's current wording of Policy CN4 does still not go far enough so as to proactively plan for the needs of this group of the community.
- 2.13 The Fogarty's Group principal contention is that the current wording of the Policy does not proactively support the provision of housing to meet the needs of the ageing population are in a form and on sites that are in locations which would suit the needs of the elderly.

- 2.14 The Council's current approach, as set out at paragraph 5.31 of the draft Local Plan is that, in the first instance, such uses will be sought within the identified settlement policy boundaries. Such an approach fails to have regard to the primary requirement to locate such accommodation in locations which will suit the needs of the elderly.
- 2.15 The Fogarty Group Ltd consider that in order to ensure that the right type of accommodation is provided to meet the needs of the ageing population, it is also necessary to have regard to the need to ensure that it is provided in the right locations to suit the needs of the elderly. It may not necessarily be the case that such accommodation would be best located in the same place as general market housing. Locating housing to meet the needs of the ageing population alongside existing care facilities for example provides the opportunity to help ensure that the care needs of residents are catered for as they age whilst at the same time allowing them to remain in their own, appropriately designed, home.
- 2.16 As demonstrated in representations to the Pre-Submission Local Plan, it is clear, in the light of the evidence presented, that the Council needs to ensure that measures are in place to actively support the delivery of elderly persons accommodation and to help ensure that it is in suitably located to meet the needs of this group of the community.
- 2.17 It is not sufficient or appropriate to simply provide accommodation for the elderly in a form that meets their needs. It must be in locations to meet their needs. The Fogarty Groups Ltd contends that this aspect should be a primary consideration, particularly given the extent of the ageing population within the Borough.

Proposed Alteration

- 2.18 Overall, Policy CN4 should be amended such that it supports the provision of schemes which make specific provision for housing and care accommodation to meet the needs of the elderly. The policy should encourage such development to be in locations and of a type which meet the particular needs of this group in the community.

2.19 However, it is not considered 'justified' or 'effective' to require all larger housing developments to provide 'Specialist housing' where there is unmet need (as the final paragraph of the policy does). Such an approach does not provide for suitable 'flexibility' and may hinder the delivery of general market and affordable housing, potentially undermining the 'effectiveness' of other housing policies in the Local Plan. Furthermore, it also fails to respond, in a positive manner, to meeting the needs of those groups, including those in need of care and the ageing population or to create strong, vibrant communities for such residents.

2.20 In light of the above, at present, it is considered that the Local Plan is unsound (as per para 192 NPPF), on the basis that:

- It is not positively prepared, as it fails to meet the full objectively assessed needs, including any unmet needs from neighbouring authorities, consistent with achieving sustainable development;
- It is not justified as the most appropriate strategy against reasonable alternatives, which have not been considered or subject to a credible SA; neither is the plan based upon credible evidence;
- It is not consistent with national policy within the NPPF to enable the delivery of sustainable development.

2.21 Policy CN4 should be reworded as follows in order to ensure that it is sound (additional text underlined / deleted text struck through):

**"Policy CN4 - Housing for older people / Specialist housing
Proposals for housing specifically designed to meet the
identified needs of older people or specialist
accommodation (including for people with support needs)
will be permitted where:**

- i. **they meet a proven identified need; and**
- ii. **the location is appropriate in terms of access to
facilities, services and public transport; and**
- iii. **the location is appropriate to meet the needs of the
ageing population; and**
- iv. **a range of tenures is provided in accordance with
Local Plan Policy CN1 (Affordable Housing).**

**Where there is evidence of an identified unmet need in the
local area, larger scale new residential developments
should incorporate specially designed housing/specialist
accommodation to meet the needs of older people and
people with support needs."**

2.22 It is considered that if the amendment to Policy CN4 set out below are satisfactorily addressed then the Local Plan would be sound as it:

- Would be positively prepared and based on a strategy which seeks to meet objectively assessed needs, namely through a positive policy approach for the delivery of housing and care accommodation for the ageing population in locations and forms to meet the needs of the elderly;
- Would be justified since it would be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; and
- Would be consistent with national policy which requires Local Plan to meet the area's objectively assessed needs (paragraph 47 of the NPPF) and to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (including, inter alia, older people and people with disabilities) (paragraph 50 of the NPPF).