

Public Examination of the Development Management Local Plan

London Borough of Lewisham response to the Inspector's agenda item 2 regarding DM5: Sheltered housing and care homes

The Council's suggested modifications clarify some aspects of the issues raised in my note of 2 December. However, some further questions remain:

(A) The revisions to the policy add a third category (care villages). Whereas the terms 'sheltered housing' and 'care homes' are generally reasonably well-defined and understood, 'care villages' may be a more variable concept and are just one of a range of other possible models for providing accommodation for the elderly or those with particular needs. The question arises, why it is necessary to introduce more complexity/specificity to the policy? If the Council's aim is to encourage the provision of appropriate forms of accommodation, would it be more appropriate for part 1 of the policy to state less prescriptively that 'The Council will support proposals for sheltered housing, care homes and other appropriate models of accommodation for the elderly and those with particular needs provided that:.....'

(B) The second main area of concern is how far it may be possible to require the provision of an element of 'affordable housing' within such schemes. Rather than attempting to tie such provision to particular models of provision, it may be clearer simply to state that in appropriate schemes, where accommodation is provided on a freehold or leasehold basis, an appropriate percentage of affordable housing will be sought in accordance with the other relevant policies of the development plan.

Changes concerning these two matters would make the policy and accompanying text clearer, shorter, more robust, more accessible and less prone to internal inconsistency.

Planning Policy – February 2014

Council response

1. Introduction

- 1.1 The Council has reconsidered DM5 in light of the issues raised in the Inspector's agenda and has determined that the wording of the policy would benefit from being made clearer, less prescriptive, more robust and less complex. This paper sets out the suggested modifications now proposed by the Council and explains the reasoning for these changes below.
- 1.2 The suggested modifications seek to simplify the policy and address the concerns raised in the Inspector's agenda including:
 - a) accommodating the suggested text from the Inspector's matter (A) in part 1.
 - b) referring to the overarching term 'specialist accommodation for older people' and thereafter 'specialist accommodation' instead of the three types of

housing throughout the policy and justification text, thereby reducing complexity.

- c) simplifying the references to affordable housing and amending inconsistencies in part 2 and paragraphs 2.62 and 2.63, in line with the Inspector's matter (B).

- 1.3 The Council also feels there is merit in making two further suggested modifications to make the policy clearer and more robust by:
- d) retaining references to the three types of housing in parts 1 and 2 and paragraphs 2.59, 2.62 and 2.63, where it helps to set the scene and explains the differences between the three types of accommodation in relation to mix of tenures and affordable housing.
 - e) removing the definitions from paragraph 2.59a and placing them in Appendix 5 Glossary; and aligning the definitions with those found in Annex 6 of the Draft Further Alterations to the London Plan (FALP) – published in January 2014. The Council feels consistency between the two documents would be preferred but recognises that these definitions are subject to change through the FALP examination and adoption process.

2. Suggested modifications

- 2.1 The Council now proposes the following modifications. Text additions are **underlined in bold** and deletions are struckthrough.

DM Policy 5

~~Sheltered housing and care homes~~ **Specialist accommodation for older people**

1. The Council will support proposals for **specialist accommodation for older people including sheltered housing, and care homes and other appropriate models of accommodation for the elderly and those with particular needs (referred to hereafter as extra care accommodation)** provided that the development:

a. ~~will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and or care~~ **is well designed to meet the particular requirements of residents with social, physical, mental and/or health care needs.**

b. will be easily accessible to public transport, shops, **local** services, community facilities and social networks ~~appropriate to the needs of the intended occupiers as well as immediate proximity to local services,~~ **for residents, carers and their visitors.**

2. In the case of self-contained sheltered housing in Use Class C3, ~~Where~~ **accommodation is provided on a freehold or leasehold basis,** the Council will expect the development to make a contribution to the supply **an appropriate percentage** of affordable housing in accordance with Core Strategy Policy 1. In the case of care homes, particularly for older people, ~~sheltered accommodation and extra care accommodation~~ **sheltered accommodation and extra care accommodation** the Council will encourage a mix of tenures.

~~3. The Council will support development of care homes that combine independent living with the availability of support and nursing care.~~

~~4.~~**3.** The Council will resist development that involves the net loss of floorspace in sheltered housing and care homes **specialist accommodation** unless:

a. adequate replacement **specialist** accommodation will be provided that satisfies points 1.a and 1.b above or

b. it can be demonstrated that there is a surplus of care homes **that particular type of specialist accommodation** in the area and

c. it can be demonstrated that the existing care homes are **specialist accommodation is** incapable of meeting relevant industry standards for suitable accommodation.

~~5.~~**4.** Where the Council is satisfied that a development involving the loss of sheltered housing or care homes **specialist accommodation** is appropriate, it will expect re-provision of an equivalent amount of floorspace, or of permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

Justification

2.59 DM Policy 5 sets out criteria for assessing housing proposals for **specialist accommodation for older people including** sheltered housing, **extra care accommodation** and care homes, including its appropriate location. The policy is consistent with the NPPF (paragraph 50) and the London Plan Policy 3.5 (Quality and design of housing developments) and Policy 3.8 (Housing choice).

2.60 A key criterion is the **need for buildings to be designed so that they are fit for purpose, with a good** fit between the facilities **supplied** and the **specialist** needs of residents. However, the relationship between a development and its surroundings is also important. **Some residents experience a greater degree of independent living than others.** In promoting independence, the Council will seek to ensure that residents, **carers and visitors** have access to the services they need, and have the opportunity to play an active role in the community. Locations with access to existing social networks and facilities is one way of facilitating interaction and can help to prevent isolation. The Council defines accessible locations as those generally located at a distance of not more than 400 metres from the proposed development site and for this distance to be accessible by means of a suitable access pathway and gradient.

2.61 There is a market for the letting and sale of care homes particularly housing designated for older people **specialist accommodation**, although the supply in Lewisham is limited at present. The Lewisham SHMA indicated that 17.9% of households in Lewisham were all older people and another 5.5% contained at least one older member of the household alongside younger members. The proportion of older households that live in the social rented sector accounts for 44% of all older

person households in the borough. Around 20% were of older person households likely to consider sheltered housing or a flat in a block specifically built for older people.

2.62 The ability of older people to access such **specialist** accommodation varies considerably depending on whether they own their existing housing, have other assets and investments, and whether they have a pension. Therefore, new **sheltered** housing for older people and others, including care homes **and extra care accommodation** will need to be available at a range of costs and tenures. ~~2.63~~ Where self-contained ~~specifically proposed for older people to buy or lease~~ **specialist housing is provided on a freehold or leasehold basis**, the Council will seek **an appropriate percentage of** affordable housing in accordance with Core Strategy Policy 1.

2.63 Affordability and the financial support available to older people will also be considerations where care homes are proposed. The Council acknowledges that arrangements for assessing affordability to people of pensionable age will be different from assessing affordability to people of working age, especially when housing costs include an element of care. ~~However, the Council will encourage the providers of care homes to include a variety of tenures to suit older people from different backgrounds.~~

2.64 Where the Council accepts that an existing site or property is no longer appropriate for ~~care homes~~ **specialist accommodation**, development for self-contained standard housing will be the preferred option, including the provision of an appropriate proportion of affordable housing. When considering redevelopment for self-contained standard housing, the Council will have regard to the criteria set out in Core Strategy Policy 1, and any need to generate funding for replacement housing for ~~a care homes~~ **specialist accommodation** elsewhere. If replacement housing is provided elsewhere, the Council will consider the proportion of affordable housing provided across both sites. The Council will resist proposals for non-residential development in accordance with DM Policy 2, and will seek to retain existing affordable housing in accordance with Core Strategy Policy 1.

Appendix 6: Glossary

Some residents living in the borough require specialist accommodation to meet their social, physical, mental and/or health care needs. Specialist accommodation can be divided into three main types:

- **Sheltered housing is self contained residential accommodation specifically designed and managed for older people (minimum age 55) in need of no or a low level of support. Each household has a self contained accommodation and the schemes normally include additional communal facilities such as a residents lounge. A warden, scheme manager, community alarm/telecare or house manager interacts with residents on a regular basis and is the first point of contact in an emergency.**
- **Extra care accommodation (sometimes also referred to as close care, assisted living, very sheltered or continuing care housing): Self –contained residential accommodation and associated facilities designed and managed to meet the needs and aspirations of people who by reason of age or vulnerability have an**

existing or foreseeable physical, sensory or mental health impairment. Each household has self-contained accommodation and 24 hour access to emergency support. In addition extra care accommodation includes a range of other facilities such as a residents lounge, a guest room, laundry room, day centre activities, a restaurant or some kind of meal provision, fitness facilities and classes and a base for health care workers. The exact mix of facilities will vary on a site by site basis. Some domiciliary care is provided as part of the accommodation package, according to the level of need of each resident. Extra care housing aims to create a balanced community, bringing together a balanced proportion of people with different levels of care needs.

• Care homes (including end of life/hospice care and dementia care): Nursing or residential care home providing non-self-contained residential accommodation for people who by reason of age or illness have physical, sensory or mental impairment, including high levels of dementia. Accommodation is not self contained; meals and personal services are routinely provided to all residents. Communal facilities are likely to include a dining room and residents lounge. There will be a scheme manager and in house care team who provide a consistent presence. Personal or nursing care is a critical part of the accommodation package. Care homes include 24 hour medical care from a qualified nurse.