

Purpose of this Advice Note

This advice note has been produced to assist developers, specialist accommodation providers and planning agents when considering proposals for specialist accommodation in Elmbridge during the preparation of the new Local Plan. This advice note focuses on understanding homes for all in Elmbridge.

Elmbridge's need for new homes has significantly increased since the adoption of the Core Strategy. The Council is committed to responding positively to the challenge of housing and affordability and is working hard to progress a new Local Plan. The emerging outcomes from the plan preparation and the evidence on the local housing need are material considerations when considering current development proposals.

Policy Context

The National Planning Policy Framework (2018) (NPPF) requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies¹.

Planning Practice Guidance (PPG) on housing for older people requires local authorities to determine the needs of the people who will be approaching or reaching retirement as well as older people now². This can include an assessment of the future need for specialist accommodation for older people broken down by tenure and type. This can include the level of need for residential institutions (Use Class C2). Local authorities will also need to identify the role that general housing may play for those older people who may not want or need specialist accommodation.

The NPPF provides a useful definition of "older people" as people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and who housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or cared needs³.

The NPPF supports efficient use of land to meet identified housing need and supports the developments making the optimal use of each site⁴.

Our existing local policies support the national approach in providing a mix of housing types that meets identified housing need. Core Strategy Policy CS19 sets out the Council's approach to securing a range of housing types and sizes on developments across the Borough reflecting the most up to date evidence in terms of the size and type of new homes.

This is further supported by Development Management Policy DM10 which requires residential development on sites of 0.3 hectares or more to promote house types and sizes that meet the most up to date local housing need whilst reflecting the character of the area.

Core Strategy Policy CS20 Older People supports the development of specialist accommodation for older people in suitable locations. However it is important to note that Policy CS20 does not automatically mean that planning permission will be granted for specialist accommodation.

¹ NPPF paragraph 61, <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² PPG, Housing Need Assessment, <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

³ NPPF, page 68, <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴ NPPF, paragraph 123, <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

In line with Core Strategy Policy CS21 Affordable Housing affordable housing contributions are sought on mixed use schemes that incorporate an element of residential development, Sheltered and Extra Care schemes (falling within Use Class C3) where there is an increase in the number of units on site.

The local need for Specialist Accommodation

The latest published Local Housing Need Figure for Elmbridge is 612 homes per year. This is significantly higher (29%) than the scale of need identified in the Council's own evidence on housing need. Previously the Borough's housing need figure was calculated in the Kingston and North Surrey Strategic Housing Market Assessment (SHMA) (2016) as 474 dwellings per year⁵. The local housing need consists of an overwhelming need for Use Class C3 accommodation (affordable and market) in comparison with modest Use Class C2 (specialist accommodation) as evidenced in the SHMA 2016.

The SHMA (2016) provides a relevant and up to date source of qualitative information regarding the size, type and tenure of homes needed in Elmbridge. It identified a local need for all forms of specialised housing for the elderly over the period 2015-35, amounting to 1,326 units, or 66 units per year⁶ (see Table 1 below).

	Sheltered housing for rent	Sheltered for lease/ownership	Enhanced Sheltered	Extra Care	Additional units 2015-2035	Annual Additional Units
Elmbridge	624	351	156	195	1,326	66

Source: Housing LIN SHOP toolkit

Most of the future demand is for sheltered accommodation (975 units; 74%) followed by extra care housing (195 units; 15%) and then enhanced sheltered accommodation (156 units; 12%).

The SHMA (2016) sets out the supply and demand and identified an immediate shortfall of 239 extra-care units in Elmbridge⁷. Whilst Sheltered and Enhanced Sheltered had a small surplus of units. These figures were identified using the Strategic Housing for Older People (SHOP) toolkit which takes a 'snapshot' based on 2014 patterns.

The figures presented in Table 2 and Table 3 below reflect the national trend of rapidly rising numbers of elderly households, with a projected 100% increase in the over-85 age group in the Borough by the year 2037, equating to around 4,000 additional households; and with a projected 45% increase in the over-65's, an increase of 9,000 households over the same period.

	2014 ('000)	2037 ('000)	Increase ('000)	% Increase
Elmbridge	4	8	4	100

Source: DCLG 2014⁸

	2014 ('000)	2037 ('000)	Increase ('000)	% Increase
Elmbridge	20	29	9	45

Source: DCLG 2014⁹

⁵ SHMA (2016), page 3, <https://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

⁶ SHMA (2016), Table 9.4a SHOP annual demand forecast, page 176, <https://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

⁷ SHMA (2016), Figure 9.6: Current Balance of supply and demand, page 175, <https://www.elmbridge.gov.uk/planning/sdps/evidence-and-supporting-docs/>

⁸ Office for National Statistics (ONS)

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2014basedprojections#projected-age-structure-population-aged-65-and-over-growing-fastest>

⁹ Office for National Statistics (ONS)

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2014basedprojections#projected-age-structure-population-aged-65-and-over-growing-fastest>

The Councils' Authority Monitoring Report (AMR) (2017-2018) recorded that the type of homes being delivered are not meeting the identified need for smaller homes and affordable housing as per the SHMA (2016)¹⁰. It also highlighted that the Core Strategy targets for delivering sheltered homes and extra care homes have not been met¹¹.

Many older households will wish to remain in their own home and will be able to do so either independently, or with a level of social-support, others may wish to downsize or have the support they require 'on-site'. Smaller homes in suitable locations provide the opportunity to downsize, allowing households to retain a level of independence whilst remaining in their community or, by providing the chance to move to an alternative area with improved access to local facilities in a home that is more manageable. Others may require more specialised accommodation that caters for their needs. This is often provided in the form of Sheltered, Enhanced Sheltered or Extra Care Housing.

The Council is aware that developers and specialist accommodation providers use an array of terms when describing their development proposals. Specialist accommodation for older people covers many different types of accommodation (e.g. Sheltered, Enhanced Sheltered, Extra Care and registered care).

Sheltered accommodation for the elderly or disabled people usually consists of private independent units with some shared facilities and a warden. Whilst Enhanced Sheltered is a term used that reflects the additional care and support needs of older residents in Sheltered housing but not high enough levels to require Extra Care housing.

Although there is no statutory definition of what constitutes Extra Care housing, it is considered to be housing that is to rent or buy, designed with the needs of frailer older people and with varying levels of care and support available on site. It often includes a restaurant or dining room, health and fitness facilities, hobby rooms and even computer rooms. Domestic support and personal care will be available all day, every day provided by on site staff¹². The Housing LIN Factsheet 1 provides a comprehensive explanation of the different terms used for extra care¹³.

Whilst residential care and nursing home options tend to be mainly self-funded although some care homes places might be publicly funded.

Meeting local housing needs

The Local Plan needs to enable the delivery of suitable homes for the current and projected growth of the local community, this includes older people living in the community and those households with specialist accommodation requirements. Different types of homes are required to offer a choice, be it smaller well-located market housing or more specialised homes offering improved safety and support suited to the various needs of people.

The limited supply of land available for development in Elmbridge means it is vital that each residential scheme makes a positive contribution towards meeting local housing need. This approach is supported by the NPPF which encourages optimal use of the land and making the most of previously-developed or 'brownfield' land. The mix and housing type of proposed new homes must be carefully balanced against the overwhelming demand for new homes (as per the standard method), the SHMA (2016) and the evidence presented in this paper. Within their decision-making the Council will balance the benefits of bringing forward Use Class C3 (dwellinghouse) which delivers affordable housing contributions rather than Use Class C2 (residential institutions).

¹⁰ AMR 2017-2018, <https://www.elmbridge.gov.uk/planning/local-plan/>

¹¹ The Core Strategy identified a target to increase provision of extra care by a minimum of 250 units over the next 10 years and increase the provision of private sheltered accommodation by 200 units over the next 10 years.

¹² Guide to housing options for older people in Elmbridge (October 2018) <https://www.elmbridge.gov.uk/housing/housing-for-older-people-and-supported-housing/>

¹³ Housing LIN Factsheet 1, Extra Care Housing – What is it in 2015?
<https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/what-is-extra-care/>

Assessing development proposals for Specialist Accommodation

In light of the competing pressures for development land, Use Class C2 proposals would need to be supported by robust evidence of local need, demonstrating that the proposal represents the most efficient use of the site. It is not sufficient to simply infer that an ageing population will reflect a need to increase care home beds. It is recommended that any supporting evidence should take into account new models of provision in housing, healthcare, local support strategies and other developments which can reduce the relative reliance on the care home market.

In support of Use Class C2 applications, a full specification of the service and facilities to justify the C2 use should be provided with particular reference to the following questions:

- What legal restrictions apply to the occupation of the units?
- What arrangements are in place in relation to the availability of care from a registered care provider?
- What eligibility criteria apply at the admission/sign-up stage? Do prospective occupiers have to have a need for paid care (above a minimum number of hours per week) at the point of moving in? Is this backed up by a formal care assessment? Are residents required to pay for a minimum number of hours per week as a condition of occupation? How many hours of care must residents agree to?
- What are the arrangements for and availability of meals?
- What is the extent of the communal facilities?

The Council is aware that developments proposals are sometimes being described as Use Class C2 (residential institutions, care to people in need of care and nursing homes) instead of Use Class C3 (dwellinghouse) in order to avoid paying affordable housing contributions. Therefore, the Council will carefully scrutinise the development proposal to ensure that the language used to describe the proposed accommodation is not disguising its intended use.

Mixed care development proposals may contain both Class C3 and Class C2 and these elements will be treated separately by the Council in order to ensure that appropriate and much needed affordable housing contributions are secured.

Positive decision and plan making

The Council is committed to positive plan making to respond to future development needs and is currently considering the level of growth that can be sustainably accommodated within the Borough over the next plan period.

The Council is acutely aware of the high demand for new homes as well as the need to provide specialist accommodation to meet the needs of its growing elderly population. The Borough is heavily constrained by land designations and, as such, the current supply of housing land is limited. Therefore, each residential development proposal will be carefully assessed by the Council to determine whether it is most the efficient use of land and that all new homes meet local need.

Through the Council's pre-application advice service, the Council will pro-actively engage with developers, specialist accommodation providers and planning agents to ensure that the development proposal makes a positive contribution to meeting local need for specialist accommodation. Developers will be encouraged to liaise with Surrey County Council during the pre-application stage to get up-to-date information on older people's housing need.

Contact details

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