

Public Examination of the Development Management Local Plan

London Borough of Lewisham response to the Inspector's initial query regarding DM5: Sheltered housing and care homes

Much of this policy (and its accompanying text) is difficult to understand, especially (but not only) in terms of their references to affordable housing and tenure. Another problem could well be that the term 'care home' is used too loosely. Questions that arise are:

Part 1a Does this imply an inappropriate degree of planning involvement in issues of operational detail?

Part 1b Occupiers of care homes will rarely be using such facilities, so how far are these criteria relevant (although they may be to sheltered housing)?

Part 2 Occupiers of 'care homes' are generally licensees or tenants so what is meant by encouraging a 'mix of tenures' in that context? Owner occupation is unlikely to fit with the care home model. Major parts of paragraphs 2.62 and 2.63 are also unclear in this context.

Part 3 Does this relate to the wider concept of 'care communities or villages' rather than 'care homes' as such where residents are not generally capable of much independent living?

(Note a complete list of all the Inspector's initial questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/development-policies/Documents/DMLPInitialQueries.pdf>)

Planning Policy – 13 January 2014

Council response

1. Introduction

- 1.1 The Council agrees that the current wording in DM Policy 5 could be misconstrued and it is suggested that DM Policy 5 be reworded to improve it's clarity.
- 1.2 The Council agrees that Part 1a provides an inappropriate degree of planning involvement in the issues of operational detail and proposes to remove Part 1a from the policy. However it is important to note that sheltered housing, care villages and care homes should be fit for purpose and will need to be designed accordingly in order to meet the particular requirements of residents in need of social and/or health care. The Council suggests modifications to Part 1 reflect this.

- 1.3 The Council agrees that people living in care homes will utilise local facilities, shops, community facilities and public transport less frequently than those people in sheltered housing and care villages, who generally have a greater degree of independence. However, people living in care homes will occasionally need to utilise local services with the aid of carers and easy access to public transport, shops and local services will be important to them. Furthermore, care homes should be located in places easily accessible to public transport in order to encourage visitors and carers to utilise public transport. The Council seeks to retain reference to proximity to public transport and local services and suggests modifications to refer to both care home residents, carers and visitors.
- 1.4 The Council agrees that residents in care homes are unlikely to be owner occupiers and suggests modifications whereby a mix of tenures is referenced only in relation to sheltered housing or care villages.
- 1.5 The Council agrees that using the term 'care homes' whilst referring to independent living is confusing and suggests modifications by referring instead to care villages, as this implies a greater degree of independent living. To help clarify, further explanation on the different types of accommodation are also suggested in the justification text.
- 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

1. The Council will support proposals for sheltered housing, **care villages (that combine independent living with extra care services) and** care homes 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~~ **Proposals for** sheltered housing **and care villages should provide for a mix of tenures. Proposals for sheltered housing** in Use Class C3, ~~the Council will expect the development to~~ **should also** make a contribution to the supply of affordable housing in accordance with Core Strategy Policy 1. ~~In the case of care homes, particularly for older people, 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, **care villages** and care homes unless:
- adequate replacement accommodation will be provided ~~that satisfies points 1.a and 1.b above or~~
 - it can be demonstrated that there is a surplus of **sheltered housing, care villages or** care homes in the area and
 - it can be demonstrated that the existing **sheltered housing, care villages or** care homes are 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 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 sheltered housing, **care villages** 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).

2.59a Some residents living in the borough require extra care accommodation to meet their social, physical, mental and/or health care needs. There are a range of accommodation types consisting of three main types:

- **Sheltered housing provides for older and/or disabled or other vulnerable people and consists of a group of self-contained residential units accompanied by a management office and communal areas such as a lounge and/or garden where tenants can socialise. Tenants are usually able to look after themselves, are active and are afforded a degree of independence. Sheltered housing is often rented whereas retirement housing is generally owner-occupied.**
- **Care villages (also known as extra care sheltered housing or assisted living schemes) provide a greater level of access and mobility for frail older people, with a domiciliary care service and personal care element being available within the scheme alongside the manager. In addition meals are usually provided in a communal dining room that provides an opportunity for social interaction.**
- **Care homes (also known as a nursing home, convalescent home, skilled nursing facility, rest home or intermediate care) are a place of residence for people who require continual nursing care and have significant deficiencies with activities of daily living and require full time assistance of nursing aides and skilled nurses. Residents include the elderly and younger adults with physical or mental disabilities and those needing physical, occupational, and other rehabilitative therapies following an accident or illness.**

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 **sheltered housing, care villages** and care homes particularly housing designated for older people, 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 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 and care villages** for older people and others, ~~including care homes~~ will need to be available at a range of costs and tenures.

2.63 Where self-contained **sheltered** housing and **care villages are** ~~is~~ specifically proposed for ~~older~~ people to buy or lease, the Council will seek affordable housing in accordance with Core Strategy Policy 1. 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~~ **The** Council will encourage the providers of **sheltered housing and care villages** ~~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, 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 **sheltered housing, care village or** a care home 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.