

**East Cambridgeshire District Council  
Local Plan Examination**

**Evolution Town Planning and Pigeon –  
Matter Statement - Matter 11**

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**E548.C1.Rep04a**

## 1.0 Matter 11: Strengthening Communities

### Inspectors Questions

#### *Homes for older people*

50. Is the wording of this element of Policy LP6 effective, clear and consistent with national policy? How does the occupancy of a development influence the visual impact of a proposal? How can a more positive approach be set out?

#### *Residential care accommodation*

51. Is the wording of this element of Policy LP6 effective, clear and consistent with national policy? How will the contribution of such communal accommodation to the housing supply be calculated?

- 1.1 This matter statement has been prepared by Evolution Town Planning Ltd on behalf of Pigeon Investment Management Ltd (Pigeon). It argues for the amendment of the Local Plan Policy LP6 to allow more flexibility for housing for older people to be located in tiers 3 and 4 of the settlement hierarchy. In order to provide mixed use development and to promote healthy communities, as required by paragraph 91 bullet point (a) of The National Planning Policy Framework (The Framework), where residents live should not be decided on the basis of age. This should be more clearly reflected in the policies. Policy LP6 allows housing for older people outside of development envelopes. This provision should be extended to tiers 3 and 4 of the settlement hierarchy, and the option of using Community Land Trusts to deliver this type of housing should be available.
- 1.2 The following evidence demonstrates that East Cambridgeshire should be delivering more housing for older people and therefore should be taking opportunities to deliver such housing in or on the edge of a wider range of settlements. Paragraph 8 of The Framework sets out the social role of sustainable development which includes *“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.”* To be sustainable, settlements should have a wide range of housing within them or nearby in a cluster of linked settlements. Paragraph 78 of

The Framework recognises that development in one village may support services in a village nearby. This supports the need to provide housing for older people in a wider range of settlements.

1.3 The National Planning Policy Guidance (NPPG) states that:

*“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. Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish. Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that are under occupied. The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Local authorities should therefore identify particular types of general housing as part of their assessment.*

*Paragraph: 021 Reference ID: 2a-021-20160401”*

1.4 The NPPG clearly sets out the need to deliver housing for older people and the Local Plan does not set out in sufficient detail how this need is to be met.

1.5 The 2013 SHMA for the Cambridge Housing Sub Region states that the age group that will see the biggest increase between 2001 and 2031 is older people. The 2013 SHMA states that:

- *“People in Cambridgeshire are living longer. Since 1991 life expectancy at birth has consistently increased across the county for both males to around 78 years of age and females to around 82 years of age. Increasing life expectancy means*

*that older people are an increasing proportion of our population and this trend is set to continue.*

- *Generally, life expectancy in Cambridgeshire is better than the national average. The gender gap has narrowed slightly over time but differences in life expectancy in different parts of the county have remained consistent. Life expectancy at 65 has also increased to more than 17 years for men and 20 for women.*
- *While the length of time we can expect to live has increased, the period we can expect to live with long term illness and disability has also increased. Periods of life spent in poor health or with a limiting chronic illness or disability have increased by more than two years in the period 1981 to 2006.*
- *The most recent figures indicate that English males aged 65 can expect to spend 4.4 years of their life in poor health and English females can expect 5.4 years.*
- *Periods of life with a limiting chronic illness or disability rose from 12.8 years in 1981 to 14.6 years in 2006 for males; and from 16.0 to 17.7 years for females.*

1.6 The increased life expectancy and the increased time that people spend in poor health or with a limiting chronic illness demonstrates the increased need for specialist care for elderly people in the district. To meet this need, policy LP6 should have more flexibility over the provision of this care.

1.7 The Submission Local Plan recognises the need to provide specialist accommodation for the elderly in paragraphs 4.3.7, 4.3.9 and 4.3.10. Paragraph 4.3.7 recognises the number of people that have a long term limiting illness and the specialist accommodation needs that arise from this. Paragraph 4.3.9 sets out the flexible forms of specialist living that allow older people to enjoy the independence of their own home with care and facilities available on site. Paragraph 4.3.10 states that residential care accommodation should be located where there is an easy access to a range of facilities to allow residents and staff to walk rather than use the car. The paragraph concludes with the recognition: *"...that current provision of nursing/care homes within the district are at the lowest level per population in Cambridgeshire."*

- 1.8 The Council’s supporting paper PS.EVR6 sets out in paragraphs 2.22 and 2.23, and paragraphs 4.7 to 4.29, details on the housing needs of older people and the evidence of that need. This refers to the section in policy LP6 on *“Homes for Older People.”* In particular the graph on page 6 of PS.EVR6 illustrates the forecast rapid rise in older people in the district.
- 1.9 The low level of nursing/care homes in East Cambridgeshire compared with the rest of the county is evidence of the need for care facilities in the district. It is accepted by the Council that there is strong evidence that the population of older people in East Cambridgeshire will increase. There is therefore a need to increase the level of specialist accommodation in the District. In rural areas the opportunities for development within settlement boundaries are limited, and therefore care homes need to be allocated in the Local Plan to meet housing needs, or flexibility is needed in planning policy to allow development to meet local needs. This is provided in policy LP6 which allows care facilities outside of settlement boundaries. By limiting the opportunities for specialist housing for older people to settlements in tiers 1 and 2 of the hierarchy set out in policy LP6, the plan is not positively prepared as it is not based on a strategy which will deliver objectively assessed development needs. It is not justified, effective or consistent with national policy.
- 1.10 The Inspector’s questions ask if Policy LP6 is effective clear and consistent with national policy, and if a more positive approach can be set out. The Local Plan demonstrates that a significant proportion of the population of East Cambridgeshire lives in the villages. The Strategic Priorities in the Local Plan include *“to deliver homes and jobs needed for the district”* which must include housing for older people. The Vision for East Cambridgeshire includes the statement: *“The needs of elderly, young and lower-paid people will receive special attention.”* The alterations we propose to policy LP6 are intended to ensure that it is effective clear and consistent with national policy, and sets out a positive approach to housing for the elderly.
- 1.11 To restrict the settlements where residential care accommodation (which policy LP6 states is *“designed to accommodate those who need some form of on-site assistance”*) is located will not deliver the Strategic Priorities of The Vision of the Local Plan. The restriction covers a wide range of care facilities, from extra care

where people may live relatively independently with care when they need it, to more intensive forms of care.

1.12 The supporting text for policy LP6 states that access to facilities is a reason why care facilities should be concentrated in the top two tiers of the settlement hierarchy. Access to facilities is for residents and workers in care homes. This justification is not supported by The Framework which in paragraph 83 states that: “Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.”

1.13 The principle of providing housing to create mixed communities is well accepted. Housing developments are required to provide a mix of house types, including market and affordable housing, and a range of house sizes to suit local needs and the market. Young people, those with families, and those in market and affordable housing, are to be provided for across the district. It is unusual in the Local Plan that housing for older people, who will make up a large part of the population, is restricted to certain settlements. This will mean that large parts of the district and a significant amount of the district’s population will not have care facilities near to them. Provision is made to provide affordable housing in rural areas through the use of “exception sites” as it is recognised that people need to live in their communities where they may have grown up, work or have families. A similar provision should be made for the elderly in the Local Plan. Providing housing for the elderly across the settlement hierarchy will allow older people to live in their communities, for example where they may have family and friends nearby. Segregating provision for the elderly does not meet the social role of sustainable development, by “*supporting strong vibrant and healthy communities*” and is unsustainable as it will lead to increased travel between communities. Providing good quality accommodation for older people has the benefit of freeing up family homes for new households which are often in short supply in rural areas. Freeing up these homes is often prevented because older people do not have suitable alternative accommodation. The proposal to allocate land for the provision of housing for older people is considered justified given the evidence of need locally.

1.14 Policy LP6 should be amended to allow more flexibility to provide residential care accommodation.

- The policy should state *“residential care accommodation, which is designed to accommodate those who need some form of on-site assistance, should be located in a settlement falling within tiers 1-4 of the settlement hierarchy.”* Policy LP6 allows care facilities outside of development envelopes, such development should be allowed in tiers 1-4 of the settlement hierarchy.
- The first sentence of the supporting paragraph 4.3.10 should be changed to (new wording underlined): “Residential care accommodation should normally be located within settlements where there is easy access to a range of services e.g. shops, healthcare and social facilities or where there is a need.”
- The third sentence of this paragraph should be amended as follows “However, as an exception, approval may be granted for care or nursing homes adjoining or close to a settlement, or as part of a Community Land Trust proposal.....”
- A new sentence should be added to policy LP6 before the final sentence under the heading “Residential Care accommodation” to say “Care facilities may be brought forward as part of Community Land Trust proposals.”

1.15 These changes would make the plan positively prepared as it would be able to meet objectively assessed requirements. It would be justified by being the best strategy based on the evidence. It would be effective and housing for the elderly would be deliverable and it would be consistent with National Planning Policy which recognises the need for housing for older people.