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Guidance

# Supported housing: national statement of expectations

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## Applies to England

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# Foreword

Supported housing provides crucial help to some of the most vulnerable people in our country. It can have an enormous positive impact on an individual's quality of life: from their physical and mental health to their engagement with the community.

We are pleased to announce the National Statement of Expectations (NSE) for supported housing. It sets out government's vision for ways of working in the sector and recommendations for standards in accommodation and is an important step in establishing what good looks like and how it can be achieved. This is part of our work to improve oversight, ensure quality and value for money.

We know that most supported housing providers already deliver high quality accommodation and go above and beyond minimum standards, including continuing to deliver during the unprecedented challenges faced during the COVID-19 pandemic. However, it is imperative that we make clear what we would like to see from all provision and that people have accommodation which meets their needs and allows them to thrive.

We have drawn on expertise and examples of excellent practice from across the sector to develop our recommendations for planning, commissioning and delivering supported housing. There can be no 'one size fits all' approach, but best practice from across the country, highlighted in our case studies, show the innovative ways that local authorities and providers deliver the best for residents. The best examples involve collaboration across housing, health, commissioners, providers and the third sector.

We hope that the NSE is useful to anyone looking for guidance on 'what good looks like' in supported housing accommodation. We look forward to continuing our conversation with you on how we can best achieve this. Thank you to everyone who has helped to bring this together.

## **Kelly Tolhurst MP**

Parliamentary Under Secretary of State for Rough Sleeping and Housing  
Ministry of Housing, Communities and Local Government

## **Baroness Stedman-Scott OBE**

Minister for Work and Pensions (Lords)  
Department for Work and Pensions

# Introduction

Good quality supported housing is vital: providing a safe, stable and supportive place to live can be the key to unlocking better outcomes for vulnerable people, from tackling poverty and disadvantage to managing crises, rehabilitation or maintaining people's independence.

This National Statement of Expectations (NSE) has been developed in collaboration between the Ministry of Housing, Communities and Local Government (MHCLG) and the Department for Work and Pensions (DWP) with input from local councils and the supported housing sector. Together, we are committed to seeing delivery of good quality supported housing which meets residents' needs and represents value for money.

In 2018 the government announced that housing costs for supported housing would continue to be funded by Housing Benefit<sup>[\[footnote 1\]](#)</sup>. At the same time, we announced a commitment to improve oversight of supported housing to ensure good quality and value for money. The NSE is an important step in establishing our vision for accommodation standards, quality and value for money in supported housing. Beyond this, we will continue to work closely with local authorities, providers and other partners in the sector to develop and test measures to improve oversight.

## What is this guidance and who is it for?

There is a high level of commitment and high standards demonstrated by the majority of supported housing providers, and, ultimately, we would like to see these embodied across the whole sector. To date there has been no definitive set of guidelines on what should reasonably be expected from the accommodation element of supported housing.

This NSE therefore includes:

- Guidelines on what good looks like in supported housing
- Guidance and best practice examples for achieving expectations, including:
  - Part 1: Assessing local need and planning effectively to meet demand
  - Part 2: Delivering accommodation which is good quality and value for money
- Annex A: Accommodation standards and tenancy-related housing services for supported housing landlords and managing agents
- Annex B: Related strategies, guidance and useful resources

All parties, including central government, play an important role in achieving the best outcomes for residents. Adhering to the NSE is not a statutory requirement. However, we hope that the wide range of organisations involved in the provision of supported housing will use, adopt and find these principles and examples of best practice helpful. This includes:

- local councils – including commissioners, Revenues and Benefits departments and Adult Social Care teams
- Clinical Commissioning Groups (CCGs)
- housing providers (across all types, including both commissioned and non-commissioned)
- registered and non-registered providers
- other local partners

We know that many local councils and organisations already exemplify best practice in areas covered by this document, and that some of the suggested standards will not be applicable or appropriate to all. The standards on which local councils may choose to focus will be informed by the local area's current stock, circumstances, future demand and organisational resource.

This NSE focuses on the accommodation element of supported housing. It does not cover the support services provided. However, effective supported housing which delivers positive outcomes requires both high quality accommodation and support, and we would encourage organisations to take separate steps to ensure any accompanying support is of a good standard and meets the needs of residents.

We recognise that the COVID-19 pandemic has placed greater organisational and financial pressures on local authorities and providers of supported housing. The NSE will reference the government's relevant COVID-19 measures as appropriate throughout but, overall, the NSE sets out the broad principles to be observed in the delivery of supported housing.

**Definition: Providers** – in this guidance, 'providers' refers to the landlord or managing agent of the property. This does not include organisations who are solely contracted to deliver support.

## What is supported housing?

In supported housing, accommodation is provided alongside support, supervision or care to help people live as independently as possible in the community. This includes:

- older people
- people with a learning disability
- people with a physical disability
- autistic people
- individuals and families at risk of or who have experienced homelessness
- people recovering from drug or alcohol dependence
- people with experience of the criminal justice system
- young people with a support need (such as care leavers or teenage parents)
- people with mental ill health
- people fleeing domestic abuse and their children

These are not always distinct groups and many individuals may have multiple needs.

The supported housing sector is diverse, comprising housing associations and local council housing, as well as charities and voluntary organisations. Housing providers and schemes can vary significantly in size and scale: from large organisations with tens of thousands of residents across the country, to smaller local providers who may own one property.

The way accommodation and support services are delivered also varies between schemes; some organisations own properties, some provide support (either within their own or another property), and some may do both. This can impact where legal and regulatory responsibility lies for each property.

This guidance has been designed to apply to all supported housing to the greatest extent possible; however, the diversity of the sector means that not all expectations in this document will be appropriate to every client group, scheme type or provider.

## How does the NSE fit with other guidance?

The standards set out in this document are not statutory or regulatory requirements and this guidance does not supersede any existing regulatory requirements that providers may be subject to.

As there is no single regulatory system for supported housing, different types of organisations providing supported housing are regulated by different bodies, such as:

- registered social landlords regulated by the Regulator of Social Housing
- charities regulated by the Charity Commission
- Community Interest Companies regulated by the Financial Conduct Authority

In addition to this NSE, there are several government strategies which aim to improve support for client groups using supported housing. Some of these are subject to specific statutory requirements which local councils must have regard to. While the standards set out are not statutory requirements, they are suggested good practice and we would encourage local councils and providers to work closely with local partners on other related strategies to promote an integrated approach. A list of related guidance and strategies is included in [Annex B](#).

## What good looks like

It is our ambition that all people who need it can access safe and good quality supported housing at the right time. We want residents of supported housing to have safe, appropriate accommodation which meets their needs, and which delivers positive outcomes, whether this means living as independently as possible or moving onto more independent living over time. We also want supported housing to provide value for money for residents, commissioners and the taxpayer, while recognising that costs can be more expensive than in general needs housing due to the specialised requirements.

To achieve this, we believe that all parties involved in the delivery of supported housing benefit from working collaboratively to:

- assess local demand for supported housing
- plan effectively for the required provision

- deliver accommodation which is good quality and value for money

We are aware that many organisations are already working in this way and delivering positive outcomes as a result - below are some examples of suggested standards and good practice. Local councils may also meet expectations in ways not described below.

## **Guidance and best practice: summary**

### **Assessing local need and planning effectively**

- There is collaboration between local councils, providers and local delivery partners to assess, plan and deliver supported housing.
- Local councils consider implementing oversight arrangements to support joined up working between partners and deliver on planning and commissioning.
- Local councils are recommended to carry out an accommodation needs assessment across all groups of people with a support or a care need.
- Local councils plan strategically to map supply against the current and future supported housing needs of vulnerable people in their areas.
- Strategic planning aligns with local authorities' obligations to reflect the needs of older and disabled people in their planning policies, as set out in the National Planning Policy Framework.
- Planning identifies how any required new supply is delivered, with alternative plans to meet need in the event there is a shortfall in planned provision.
- Planning identifies care and support for any planned provision will be funded, considering the different needs of residents and the different options available for support.
- In meeting these needs, local councils consider options across the spectrum of support and care services, such as preventative services or support in people's own homes, as well as the use of supported housing.
- Planning accounts for how the supported housing fits with wider local support pathways, including health and social care referral pathways.
- Cross-authority arrangements are developed, for example setting out where a client group can access services if there is no provision in a local area, or where it is more appropriate for the individual to be housed outside their local area.
- Local councils are transparent and accountable on delivery against local strategic planning - plans are made public, with annual public reporting on delivery.
- Local councils keep a database of supported housing providers and schemes (both commissioned and non-commissioned) and share with all agencies who might be making referrals.
- Local councils ensure that all relevant teams (including across upper and lower tiers) are aware of plans to commission and deliver supported housing.

- Commissioning teams seek opportunities to work collaboratively with other organisations to plan and commission supported housing

## **Ensuring safe and good quality supported housing**

A detailed list of suggested accommodation standards for landlords and managing agents is included at the end of this document.

- Accommodation is assessed for its suitability in meeting the needs of residents.
- Housing is accessible, appropriate, safe and hazard-free
- Landlords fulfil their role in compliance with all relevant guidance
- Providers ensure staff are safe and suitable to be in contact with and work with vulnerable client groups
- Staff working as part of the supported housing scheme demonstrate an understanding of services and receive comprehensive training.
- Housing meets all building-related and environmental statutory requirements, including those on fire, access and health and safety.
- There is regular communication and collaboration between local council housing services, landlords, managing agents, support staff and commissioners of support services, to share information so that arrangements can be adapted as resources or residents' needs change.
- Communication and information for residents are appropriate to their needs. Residents are consulted and involved in the service development and their preferences considered.
- Clear, simple and accessible complaints and redress procedures are in place.
- Residents are given the most secure form of tenancy compatible with the purpose of the housing and their needs and circumstances.
- Quality standards are in place for response and repair times for both routine and emergency repairs.
- Referrals into supported housing involve two-way communication between referring organisations and supported housing providers on individual needs and suitability for a scheme. The individual is involved in the referral process and their input is sought to address their objectives.
- Organisations making referrals into supported housing carry out a housing needs assessment for residents and place them in accommodation which is appropriate for their circumstances. Referring organisations involve support providers at an early stage and the supported housing provider also completes an assessment to verify the suitability of the referral.
- There is effective communication and information between the referring organisation, any care provider and housing provider on the individual's needs to confirm the suitability of the referral.

## **Ensuring supported housing provides value for money**



- Costs for rent and eligible services charges are transparent and reasonable.
- We would encourage supported housing providers to participate in sector-led accreditation and benchmarking schemes which demonstrate compliance with standards and are aimed improving transparency and performance on value for money and quality of housing services.
- We would encourage Revenues and Benefits departments and commissioners to share knowledge and data internally and between neighbouring authorities to benchmark the level of service required in different types of supported housing schemes and appropriate costs for rents and associated service charges claimed. This can include seeking input from trusted local providers.
- Local councils consider using their existing powers relating to both housing, health and safety and Housing Benefit to enforce minimum housing standards in supported housing and to ensure housing costs are not excessive.
- Both local councils and providers ensure they take a consistent approach to administration and information sharing.

## Part 1: Assessing local need and planning effectively to meet demand

Local councils have the lead role in planning to meet local demand for supported housing. To be effective, councils need to plan strategically to ensure that supply aligns with the current and future supported housing needs of vulnerable people in their areas. This will include any appropriate supply of accommodation that might come from private market development, including non-commissioned and leased provision.

To plan effectively and assess current and future needs of all client groups, local councils must ensure joined up working between teams, for example housing, public health commissioners and adult social care, authority tiers, local health commissioners (Clinical Commissioning Groups) and other local partners.

A list of useful resources and guidance on strategic planning for supported housing can be found in [Annex B](#).

It is essential that local councils and their local partners consider the impacts of COVID-19 when assessing capacity of schemes. Housing providers may have had to reduce the occupancy in some properties to facilitate social distancing and shielding of vulnerable tenants.

The examples of good practice below are primarily aimed at local councils, but all stages of strategic planning will benefit from input from providers and other partners.

### Working collaboratively to plan supply

Local councils, providers and local delivery partners collaborate to assess, plan and deliver supported housing which will support improved outcomes.

**Case study: Bristol's Housing Related Support Strategy**

In 2017, Bristol had the sixth highest rate of rough sleeping in England. Commissioners recognised a bold new Housing Related Support (HRS) strategy was required to address cyclical homelessness and create permanent routes to sustainable accommodation.

Engaging with a network of third sector organisations, Bristol City Council developed new HRS pathways for adults and young people with complex needs experiencing homelessness. The Salvation Army leads the men's pathway bringing together specialist Registered Social Landlords and charities to supply high quality accommodation.

The Bristol men's pathway comprises over 340 units of supported housing across 50 sites, spanning high to low levels of need.

People entering the pathway have their housing needs assessed and triaged through centralised fortnightly Operational Management Groups (OMGs), where all lead partners are represented. This promotes joined-up decision making, matching people's housing needs to the right pathway and accommodation.

As a result of this approach, Bristol City Council has seen increased move on to independent accommodation. Through joint working, providers have also improved the consistency of support available to people post move on, offering greater consistency to residents at a time of heightened stress.

As an integrated pathway, providers have a unified understanding of relevant Key Performance Indicators. The men's pathway is benchmarked against other pathways within the model to ensure consistency of delivery and promote best practice across the city.

In two-tier authorities, upper and lower tier authorities are encouraged to work collaboratively on their strategic planning, as well as with other local partners. Plans will be most effective where they take all client groups into account.

Local councils may also benefit from extending such partnership working to include other neighbouring local councils to manage supply across boundaries.

Providers can play a valuable role in local planning for supported housing. They are expected to be aware of, and have regard for, assessments of the local area's needs and priorities and strategies for delivering supported housing. This may include planning by local councils and health bodies.

**Case study: Developing a community-led approach to age friendly housing in central Bedfordshire**

"There has never been a better time to harness the interest and contribution of local residents to develop housing that meets the changing needs of our

population.” says Councillor Eugene Ghent, Council Executive Member for Asserts & Housing Delivery. He explains:

“To unlock the potential for communities of place and communities of interest to actively commission and take responsibility in meeting their housing needs, we learned that without local infrastructure, promoting and providing expert advice on the opportunity for communities to take control of their housing needs, development opportunities would remain out of reach for most if not all of our communities.”

Including a local voluntary sector infrastructure organisation at the outset has enabled Bedfordshire Rural Communities Charity to pick up the community-led housing (CLH) baton; secured funding to broaden their housing enabling role in achieving accreditation as CLH advisers and helped to establish Eastern Community Homes (ECH) as the one-stop-shop for advice and guidance. ECH provides access to the experienced and influential network spanning the East of England to import good practice and enable CLH to emerge in Central Bedfordshire.

Through a series of CLH workshops and output from Neighbourhood Plans, the Council learned that their communities have a keen interest in development but without the awareness and confidence to step into the driving seat and take control. “With the imminent arrival of New Vista Homes (NVH), the council-owned development company, we add another ingredient to the CLH recipe with the potential for NVH to act as a more accessible community focused developer with the interests of local people at heart,” says Eugene.

Improved appreciation of the depth of the Core Economy deriving from insights generated through the pandemic journey provides the catalyst and next step in identifying and aligning resources, to create genuine opportunities that pursue the mutuality of CLH. The Council believes this will allow people to benefit from supported housing with meaningful opportunities to determine design, delivery, ownership and control of their homes.

Local councils may find it useful to nominate an individual who will lead collaborative working on planning, commissioning and delivering supported housing by liaising with all stakeholders and setting a cross-organisational agenda. Wider partners could also consider nominating a lead individual. Collaboration involves agreement of joint objectives and ways of working, and regular collaboration between partners.

Collaborative working could involve:

- neighbouring local councils
- Health and Wellbeing Boards
- Clinical Commissioning Groups and relevant NHS bodies
- sustainability and transformation partnerships and integrated care systems
- safeguarding adults boards

- adult social services
- children's social services
- directors of public health
- the Police and Police and Crime Commissioners
- local domestic abuse partnership boards
- local drug and alcohol treatment providers
- HM Prisons and Probation Service (including prisons, National Probation Service, Homelessness Prevention Taskforces and Community Rehabilitation Companies)
- Youth Offending Teams and the Parole Board
- community mental health teams
- housing and support providers, including non-commissioned providers, particularly in the sheltered and short-term sectors
- health providers
- community and voluntary sector organisation

### **Case study: Devon Transforming Care Partnership**

NHS Devon CCG, working with three local authorities as Devon Learning Disability and Autism Partnership (LDAP) formerly Transforming Care Partnership, has successfully supported 50 adults to return to live at home since 2015. The Partnership continues to work with NHS and community providers to source suitable packages of care for people with learning disabilities and autism.

The Partnership has facilitated seven property purchases since 2018, using NHS England capital, and jointly worked with a national housing association to provide homes for people within the programme. Properties are sourced based on the person's wishes and needs, support is commissioned on an individual basis and staff provide support 24/7.

NHS Devon CCG has recently re-launched the 'Test of Change' pilot that seeks to encourage more quality supported living providers to the market by developing an enhanced community support specification. Following extensive engagement with the supported living market, the enhanced specification contains a contingency fund to cover emergencies without the need to navigate around complex funding panels, a fixed funding model and the use of the 24/7 grid toolkit to monitor progression from hands on care to enabling care based on the progression model.

The CCG worked with providers and community partners to design services to meet the complex needs of each person, using Individual Service Designs (ISD) to capture the essence of the person and specific likes/dislikes to ensure that the care provided is both person centred and flexible. The CCG has offered a clear indication of future need to providers and has encouraged providers to work together to share training costs and workforce plans. An

NHS Network has been set up to facilitate joint working and information sharing between providers.

The Partnership has been recognised for their success in joint working and market development. Lessons learned from this approach will be used to support a similar project for children with learning disabilities and/or autism. “The success of the project so far has been down to the system-wide sign-up from our partners”, says Shona Charlton, Head of Learning Disabilities at NHS Devon CCG. “

Local councils consider implementing oversight arrangements to support joined up working between partners and deliver on planning and commissioning.

Formal partnership boards, or cross-sectoral meetings or governance arrangements can be useful to oversee this work, or alternatively existing structures can be used. As well as supporting strategic planning, governance networks between local council groups can be used to share best practice and benchmark quality and costs.

### **Case study: Lewisham Council**

Lewisham Council commission 580 beds of supported housing across 3 supported housing pathways – mental health, young people and vulnerable people. Through the pathways provision of different levels of support, they aim to support people to move to the most appropriate form of accommodation.

Given the emergence of a number of providers aiming to support people with mental health needs that the Council did not directly commission, Lewisham Council took a strategic decision to work closely with a select group of non-commissioned providers to ensure that their services are used efficiently, are of decent quality and deliver positive outcomes for people.

The partnership work with these providers is based on certain criteria, including the standard of accommodation. The commissioning team advises the Revenues and Benefits team on the approach to these providers, who then become part of the council’s pathway with their voids allocated by a central panel. The Council collect data on outcomes for both commissioned and non-commissioned providers, to track the performance of their services and consistency of standards.

This approach has been successful in part because of the Council’s established mental health pathway for supported housing, which helps people to move forward as their needs change. The pathway gives the Council clear oversight of who is waiting for accommodation, and for what kind. The Council and providers meet for fortnightly planning meetings, to allocate people to accommodation and identify where people are ready to move to a different kind of housing. This frees up commissioned beds and helps to ensure that voids are always filled promptly – ensuring stock is used effectively.



Building relationships with non-commissioned providers ensures that people in Lewisham have a greater range of accommodation and support options offered by the Council, and that these meet their standards to help ensure they are receiving the best possible support and accommodation.

## Identifying people's current and future needs

Effective local strategic planning for supported housing will normally be underpinned by a needs assessment, across all groups of vulnerable people.

This would assess current demand and future need to set appropriate strategic objectives and priorities by utilising new and existing data and seeking input from experts and practitioners. This could also draw on existing Joint Strategic Needs Assessments or other plans.

Particular attention may be needed to ensure that all groups of vulnerable people are represented in the needs assessment. This includes less visible groups or groups for whom data is harder to identify.

### Case study: Haringey Council's review of supported housing

In 2014, Haringey Council commissioned a review of supported housing in the borough. The Council wanted to understand:

- what the gaps and demand for supported housing were in the borough
- where council-owned stock was delivering supported housing, and whether this was the best use of it; and
- how cost-efficient the provision of supported housing was and where potential savings were

The review was co-owned across the organisation and the project board made up of representatives from all participating departments. This meant the whole Council was invested in the review and its findings and championed the recommendations and analysis.

Gill Taylor led the review over a year, engaging with teams in and out of the Council and in local health services, visiting supported housing schemes in Haringey and beyond, researching best practice and talking to residents and clients about their experiences.

One of the biggest challenges was the accuracy and quality of the data available, and the inconsistency in how information and data were collected across schemes and client groups. For example, there was a complete lack of information on LGBTQ+ groups. "This was a problem for our review, but the fact that there was such a significant gap told a story in itself," explains Gill.

As a result, commissioned services now include a wider range of demographics as part of their reporting. The Council has also commissioned a dedicated LGBTQ+ network to champion the needs, experiences and

inequalities faced by LGBTQ+ people in Haringey and the organisations working on their behalf.

Based on the review's findings, the Council recommissioned their youth homelessness pathways to ensure care leavers can better access youth homelessness services and the wider support needed to sustain tenancies and accommodation. The Council also recommissioned their older people's housing-related support services to ensure that older people living in all housing types anywhere in the borough are able to access support to stay independent for as long as possible.

"Another benefit of the review is that there is now a much closer working relationship between teams in the Council. Supported housing and floating support services are much more visible, and people better understand the role housing-related support can play in reducing pressures on other services and improving people's lives" Gill adds.

## Planning for supported housing

Map supply against current and future supported housing needs of vulnerable people.

Align planning with the requirements set out in the National Planning Policy Framework.

The government has strengthened the revised National Planning Policy Framework so that local planning authorities are expected to have planning policies which identify the size, type and tenure of homes required for different groups in the community, including older people and people with disabilities. Further information is included in the [Planning practice guidance on housing for older and disabled people](https://www.gov.uk/guidance/housing-for-older-and-disabled-people) (<https://www.gov.uk/guidance/housing-for-older-and-disabled-people>).

Identify how planned new supply will be delivered, for example through commissioning grant-funded new build or refurbishment of accommodation, gifting of land, S106 planning consents<sup>[footnote 2]</sup>, grant-free specialised supported housing or other business models such as leased accommodation.

### What funding is available to support supply?

Government capital grant funding is available to support the supply of certain types of new supported housing. This includes:

- **Affordable Homes Programme:** The government has launched a new £11.5 billion Affordable Homes Programme that will deliver a range of affordable homes between 2021/22 and 2025/26, including supported housing.
- **Care and Support Specialised Housing (CASSH) Fund:** This funding aims to support and accelerate the development of specialist housing which meets

the needs of older people and adults with learning and physical disabilities, and mental ill health.

- **NHS England capital funding:** Available to support the provision of accommodation for people with a learning disability, autism or mental ill health. Grants are secured through a legal charge or restriction on title against the property.

In addition, in October 2018 the government abolished the Housing Revenue Account borrowing cap, freeing up councils to double delivery to around 10,000 new council homes a year by 2021/22. Councils will be able to use this new borrowing flexibility to help finance the development of new supported housing. To further help councils build, the government is providing a longer-term rent deal up to 2025, providing a stable investment environment to deliver new homes.

Any capital funding bids for sheltered and extra care housing need to be linked to an identified need.

Plan how the care and support for any planned provision will be funded, considering the different needs of residents and the different options available for support.

When planning to meet the housing needs of vulnerable people, consider options across the spectrum of support services, such as preventative services or support in people's own homes, as well as the use of supported housing. Depending on the needs of the individual, other support services may be more appropriate. The needs of individuals requiring support are always be the primary consideration including – where possible – the individual's own preferences.

Consider and plan for how the supported housing fits with wider local pathways, such health, social care and criminal justice pathways. For example, the different housing and support options for residents to move onto, and the availability of these services.

## Managing local need

Develop cross-authority arrangements, for example setting out where a client group can access services elsewhere if there is no provision in a local area and putting arrangements in place with surrounding authorities for placing people into supported housing out of their areas. This can be particularly important for some groups of people, including those fleeing domestic abuse, people with experience of the criminal justice system, or those recovering from substance dependence, for whom accessing housing outside their own local area may be more suitable.

Be transparent and accountable on delivery against local strategic planning - make the plans public, report against delivery on an annual basis and publish the results. This could include reporting to local partnership boards for scrutiny.

It may also be helpful to keep a record of supported housing providers and schemes (both commissioned and non-commissioned) and share with teams



across the local authority as well as with all agencies who might be making referrals.

A record of supported housing schemes in the area can help local authorities to maintain oversight of local provision. Recording information on the costs associated can also ensure that costs are reasonable, transparent, comparable and represent good value for money.

### **Case study: Sunderland City Council's record of supported housing providers**

Sunderland City Council keeps databases of providers which enable more efficient, joined up working across teams within the Council. For example, they maintain a list of providers which is shared with local DWP and internal colleagues, so they are aware of what schemes exist and which have supported exempt accommodation status.

They also record core rents and service charges across all supported housing schemes, which allow the team to make comparisons and determine whether costs for any new schemes appear reasonable.

Maintaining a record for each provider, with a breakdown of the rent for all their schemes, the charges they have submitted and the amount the Council have agreed to pay, allows the Benefits Manager to determine what the charges represent and whether they are reasonable. When providers submit rent changes for their schemes, this record shows where charges have been increased significantly or where new charges have been added.

This allows the Council and their partners to ensure that costs are reasonable, transparent and represent good value for money.

This record could include a function to capture any additional information which may help with the suitability of accommodation for particular individuals. For example, an awareness of the geographical location of schemes, especially those catering for more specialist or vulnerable groups. Sharing intelligence on available supply will build data on local need and will make referrals easier, particularly for short-term accommodation.

## **Good practice in commissioning**

Local councils ensure that all relevant teams (including across upper and lower tiers) are aware of plans to commission and deliver supported housing.

This includes commissioning teams, Revenues and Benefits teams, adult social care, children's services and housing. This can also include local health commissioning bodies (Clinical Commissioning Groups) where relevant. Local councils will benefit from engaging with providers and involving them in decisions on commissioning to the greatest extent possible.

It is also helpful to ensure transparent and timely communication with housing providers on matters related to their properties, including informing them when commissioning or re-commissioning support services in their scheme.

For further information on best practice, local councils can refer to the National Audit Office's [Principles of Good Commissioning](https://www.nao.org.uk/successful-commissioning/general-principles/principles-of-good-commissioning/) (<https://www.nao.org.uk/successful-commissioning/general-principles/principles-of-good-commissioning/>).

Commissioning teams seek opportunities to work collaboratively with other organisations to plan and commission supported housing.

### **Case study: Joint commissioning through the Integrated Personal Support Alliance**

In south London, the work of the Integrated Personalised Support Alliance (IPSA) is transforming mental health support in the local area.

IPSA began in 2015 as a new approach to the rehabilitation and recovery of people with long-term mental health conditions in Lambeth, involving health services, local government and the voluntary sector. It aims to provide an alternative to bed-based residential and hospital provision through services like community-based supported accommodation.

The Alliance is a partnership between Lambeth Council, Lambeth Clinical Commissioning Group (CCG), the South London and Maudsley NHS Foundation Trust (SLaM), and voluntary sector providers Certitude and Thames Reach.

The Alliance has agreed, shared objectives and all partners play an equal role. A single performance framework ensures everyone works to the same outcomes: the focus is on people's rehabilitation and recovery, not the results of individual providers.

"The Alliance built on the strong, positive working relationships that already existed in Lambeth," says Denis O'Rourke, Former Assistant Director of Integrated Commissioning for Mental Health. For example, his role is joint across the Council and CCG. "But the key to success has been shared values, and outcomes and agreement on the direction of travel."

While this approach has challenges, such as different organisational and cultural approaches to supporting people, the Alliance has seen positive results. Since 2015, IPSA has saved almost £2.5 million (around 20% of their overall budget) through finding alternative to residential, nursing, inpatient rehabilitations and spot placements. It has led to over a third of the original 200-person cohort finding more appropriate accommodation, such as an IPSA scheme, supported housing or their own home.

## Part 2: Delivering accommodation which is safe, good quality and value for money

Supported housing accommodates some of the most vulnerable people in our society; it is therefore essential that it is safe, of good quality, meets residents' needs and fits with the local community. It must also provide value for money for the resident, commissioner and taxpayer.

The quality ultimately determines outcomes – higher quality means individuals are more likely to experience better outcomes, whether that means successfully living independently, navigating and staying out of crisis or managing their health effectively. This not only results in a better quality of life for residents but can also support more effective use of resources elsewhere for public services and local councils.

Working collaboratively is crucial. We would encourage providers to engage with their local council to demonstrate the safety, quality and value of their service.

All organisations involved in the delivery of supported housing have a role to play in achieving safe and high quality housing, including:

- **providers**, in making sure housing is safe, well managed, of a good standard and costs are fair
- **local councils**, in assuring themselves of the suitability, safety and quality of accommodation (in both commissioned and non-commissioned provision) and monitoring costs
- **bodies making referrals**, including where these are made to other areas or where they have not commissioned or funded directly

It is important that residents are consulted and content with the placement. We would also encourage referring bodies to follow up with individuals or their representatives after individuals are placed in accommodation to ensure that the accommodation meets their expectations and needs.

### Safety and quality in supported housing

Delivering safe and high quality supported housing means providing accommodation which is safe, comfortable and meets residents' needs.

At the end of this document we have included a detailed checklist of both legal requirements and suggested standards for accommodation and tenancy-related housing services, to be used by supported housing landlords and managing agents. These standards are equally relevant to commissioned and non-commissioned housing providers.

There are additional considerations, highlighted throughout this section, that need to be made in light of the COVID-19 pandemic to protect residents and staff.

For supported housing with commissioned support, the accommodation will need to comply with any accommodation standards set out by support commissioners (commissioners may wish to refer to the standards in [Annex A](#)). This may be higher than the minimum statutory standards in some cases.

However, all organisations involved in the delivery of supported housing contribute to ensuring good standards of accommodation for residents – we have summarised some of our key recommendations below.

### **Case study: A Psychologically Informed Approach at Hope Gardens**

Hope Gardens is a 27-bed supported housing scheme in West London for individuals with experience of homelessness and complex needs. It is commissioned by Hammersmith and Fulham Council and run by charity and housing association, St Mungo's.

Hope Gardens was chosen for its residential location, while being close to amenities and local services. The scheme Gardens was refurbished in 2014, in close consultation with residents. The refurbishment was informed by a Psychologically Informed Environments (PIE) approach, which recognises how the physical environment, culture and interactions between residents and staff can influence residents' mental health.

Each resident has their own room with a lock. There are female only safe spaces and there is flexible support for couples. A private room allow residents to spend time with their families, participate in private therapy sessions or meet their key worker.

The spacious communal areas were decorated with residents' input. Information on display is designed to help residents feel welcome and motivated to achieve their goals and includes photos and information about the staff and the activities on offer.

Residents contribute to the community by helping with breakfast, watering the plants, or running bingo on a Sunday. As a result, residents engage well with the support available. 74% of residents make a positive move to more independent, or other appropriate housing when they leave Hope Gardens – higher than the organisational average.

“Every step of the way, we try to make sure Hope Gardens is a positive environment where people want to live and can feel positive about their lives. The residents really care about the space and this sense of community definitely helps residents to start to rebuild their lives.” Amy Rice, Service Manager at Hope Gardens

### **General expectations for housing**

Accommodation is assessed for its suitability in meeting the needs of residents – by commissioners, bodies making referrals, and landlords and managing agents

of supported housing when referrals are made. Individuals are consulted and their views sought in this process.

Housing is accessible, appropriate, safe and hazard-free with adequate protection for residents from COVID-19.

### **Case study: Delivering Extra Care in a COVID-safe environment at Mosscafe St Vincent's Housing Group**

MSV Housing is a north west based placeshaper and social landlord, with over 50 years spent investing in and serving its communities.

Over the last year, MSV Housing has worked with Manchester City Council and Homes England to develop a 72-unit extra care scheme, as part of a wider development in Manchester. However, the scheme's development coincided with the emergence of COVID-19.

In future, all schemes will need to consider second waves or future pandemics and these elements should be designed in as standard," says Charlie Norman, Chief Executive of MSV Housing. "However, our scheme was at an advanced stage when the pandemic hit, so we didn't have this luxury. We've had to innovate and make adjustments to the model to keep people safe."

MSV Housing has ensured clear messaging in the scheme on the importance of social distancing and good hygiene, especially regular handwashing. In addition, there is understanding among staff, residents and visitors of COVID-19 symptoms and the need to self-isolate and to seek a test if experiencing symptoms.

The scheme has implemented a range of practical measures to keep residents safe, including hand sanitiser stations and mobile screens so that residents can move around. They have added garden furniture with socially distanced spacing and a gazebo. Inside, passing places on corridors are clearly marked and an enhanced cleaning schedule is in place. A visiting rota for families ensures that local guidance and restrictions are upheld. Staff working on the scheme are fully briefed and wear PPE as required when interacting with residents.

The pandemic has changed the nature of extra care and people's interactions within it. Yet MSV believes the model can be adapted without undermining its core principles, providing providers take a full and active role in creating a COVID-19 safe environment, recognising the additional risks the virus poses for a disproportionately vulnerable client group.

Landlords fulfil their role in compliance with all relevant guidance, including leasing terms for the building and contractual arrangements with the managing agent where accommodation and support is delivered by different organisations.

Providers ensure staff are safe and suitable to be in contact with and work with vulnerable client groups

Staff are supplied with appropriate personal protective equipment (PPE) with which to carry out their role for the safety of themselves and the residents.

Landlords, managing agents and all staff working on-site demonstrate an understanding of supported housing services and are provided with comprehensive training appropriate to their role.

Core competencies relating to safeguarding, equalities and building safety are particularly important and training programmes include regular refreshers on key issues and opportunities for learning and development. Staff are supported to acquire appropriate qualifications, where relevant.

Staff are trained in measures to maintain health and safety in the accommodation in light of COVID-19.

There is [guidance available from Public Health England](https://www.gov.uk/government/publications/covid-19-how-to-work-safely-in-domiciliary-care) (<https://www.gov.uk/government/publications/covid-19-how-to-work-safely-in-domiciliary-care>) to support organisations providing care which provides more detail on using the appropriate PPE.

## **Case study: Staff training by supported housing providers**

### **Depaul**

Depaul UK is a homelessness charity with a focus on young people. It manages supported housing for around 400 young people in 14 local authority areas.

Depaul UK has recently supported all their housing management workers to complete a three-day Managing Safely course delivered by an independent training provider and accredited by the Institution of Occupational Safety and Health, the Chartered body for safety and health professionals. The course is the industry standard for conducting risk assessments and staff receive a qualification on its completion.

“Our staff are now better able to identify hazards and potential physical risks to the safety and wellbeing of our residents,” said Carly Lyes, Learning and Development Manager.

### **Golden Lane Housing**

Golden Lane Housing (GLH) works with people with a learning disability to provide supported housing around which they can build their lives. They provide housing for around 2,000 people across England, Wales and Northern Ireland.

Safeguarding is key for this client group. Recently, GLH made the decision to bring their repair team in-house. All staff, including operatives who visit supported housing schemes, receive a comprehensive induction which



includes training on the protection of adults at risk. In addition to this, staff receive yearly refresher training on recognising the indicators of abuse and the actions to follow should they have a concern about a tenant.

GLH's safeguarding policy and procedures further support staff in dealing with any safeguarding concerns. GLH are passionate about embedding a culture where staff understand that it is everyone's responsibility to help keep an adult at risk safe from abuse.

### **Case study: Adapting to service delivery for COVID-19 at Evolve Housing**

Evolve Housing + Support is a homelessness charity in London, providing housing and support to over 2,000 people each year.

"The pandemic has meant a great deal of change for everyone. We have had to adapt quickly to protect others, change working practices and constantly review our decisions to ensure we are doing everything possible to support our customers," says Jeremy Gray, Chief Executive. "As soon as we understood the severity of COVID-19, it became our top priority to create a system to protect our homeless customers, many of whom fall into the COVID-19 vulnerability category".

Evolve's Business Continuity Plan, which is tested on a biannual basis, was implemented quickly as soon as social distancing became necessary to control the spread of infection.

At the beginning of March, Evolve cancelled all non-essential meetings and postponed all training, secured extra PPE for services, and organised regular virtual management calls. This enabled them to proactively address all new government guidance and to ensure all services were fully supported.

Before the national lockdown was introduced, Evolve issued infection control guidance to support staff to work safely, and wrote to all customers with information about COVID-19. As an early precaution to control the spread of infection, all guests and non-essential visitors were stopped from entering supported housing schemes.

Once restrictions were brought in, Evolve developed clear guidance around new ways of working and infection control and prioritised helping staff who could safely be in work to access key worker services and safe modes of transport. Knowing where there were high levels of staff absence allowed them to redeploy the community team to reduce the need for agency spend.

In preparation for the easing of lockdown restrictions, the organisation have focused on ensuring that all services meet the 'COVID-19 Secure' standard. This includes conducting individual risk assessments with each member of staff and reviewing the organisational Business Continuity Plan. Frontline staff have been provided with face masks and hand sanitiser.

So far, Evolve have had no customer confirmed cases of COVID-19 in any of their services. They are now starting to reflect and identify learning which will enable them to act more insightfully in the future, and sharing these with their local authority partners. This will ensure that all services are sufficiently prepared for the possibility of a second wave.

## Accommodation

**Definition: Accommodation** – all aspects of the building, including residents' living areas and communal spaces.

Housing meets all building-related and environmental statutory requirements, including those on fire and health and safety.

The Regulator of Social Housing requires that all registered providers meet the Decent Homes Standard. We would suggest that all non-registered providers meet this standard as best practice, along with the standards and extra duties for Houses in Multiple Occupation (HMOs), both licensable and non-licensable (buildings controlled or managed by registered social landlords are not HMOs under the Housing Act 2004). Providers should comply with local licensing requirements where applicable.

## Legislation: quick guide

The [Decent Homes Standard \(https://www.gov.uk/government/publications/a-decent-home-definition-and-guidance\)](https://www.gov.uk/government/publications/a-decent-home-definition-and-guidance) sets out that social housing must: meet the current statutory minimum standard of housing, be in a reasonable state of repair, have reasonably modern facilities and services, and provide a reasonable degree of thermal comfort.

Larger HMOs (classified as those with 5 or more occupants forming 2 or more separate households), are licensable, but local authorities also have the power to declare smaller HMOs subject to licensing. Landlords of non-licensable HMOs must still comply with the Management of Houses in Multiple Occupation (England) Regulations 2006, which set out duties of the managers of these properties.

## Communication

There is regular communication and collaboration between housing teams, landlords, managing agents, support staff in accommodation and commissioners of support services, to share information so that arrangements can be adapted as resources or residents' needs change. Where applicable, communication responsibilities and expectations could be clarified within any service agreements between stakeholder parties.

Resident communication, information, consultation and involvement is appropriate to their needs.



Clear, simple and accessible complaints and redress procedures are in place.

## Security of tenure

Residents are given the most secure form of tenancy compatible with the purpose of the housing and their needs and circumstances.

## Repairs

Quality standards are in place for response and repair times for both routine and emergency repairs. Non-emergency repair times may be agreed with the residents, where appropriate, to create a more resident-focussed approach.

## Referrals

Referrals into supported housing involve two-way communication between referring agencies and supported housing providers on individual needs and suitability for a scheme. Individuals are involved in the referral process and their input is sought to address their objectives.

Organisations making referrals into supported housing carry out housing needs assessment for residents and place them in accommodation which is appropriate for their circumstances. Referring organisations engage with providers at an early stage and the provider also completes an assessment to verify the suitability of the referral.

Needs assessments assess an individual's suitability for a scheme based on their vulnerabilities and risk and the appropriate 'mix' of residents in a household.

There is effective and timely communication and information from the referring organisation, so that the supported housing provider is aware of the residents' individual needs and is able to confirm the suitability of the referral.

### **Case study: Anchor Hanover's tenancy suitability assessment**

Anchor Hanover is a specialist provider of older people's housing with more than 54,000 homes across England.

They are trialling the use of a 'tenancy sustainability assessment' in their independent living and extra care housing schemes. The assessment supports potential residents to make a success of their new home but also ensures that they and other residents will remain safe. Anchor Hanover is already seeing the benefits of this initiative.

This year, Mr Martins\* was nominated for an Anchor Hanover housing scheme in Bromley by the Council's Adult Social Care team. Before accepting the nomination, Anchor Hanover's Housing Assistant (HA) made a home visit to Mr Martins to complete the tenancy suitability assessment.

During the visit the HA established that Mr Martins was hard of hearing and wore one hearing aid. This information had not been included on the

nomination form. Mr Martins told the HA that he wasn't certain whether he would be able to hear the fire alarm system in bed with or without his hearing aid. Mr Martins felt that for his own and others' safety, he needed an adaptation to his home and the HA discussed different options with him before making a decision.

The Anchor Hanover team ordered a vibrating pad for Mr Martins' new home and it was fitted the week he moved in. Housing staff showed Mr Martins how the device worked and how to ensure that it remained charged. His Personal Emergency Evacuation Plan was updated, and the on-site care team were notified of the safety device which required checking at the evening call.

Completing the tenancy suitability assessment and making the appropriate adjustments has made Mr Martins more comfortable in his home and ensured the safety of the residents and building.

\*Names have been changed

### **Case study: Telford and Wrekin Council's providers forum**

Telford and Wrekin Council has developed an extra care providers' forum to increase joined up working and efficiencies in supported housing.

The quarterly meetings bring together providers of extra care housing, adult social care operational managers, commissioners from housing and adult social care. Other stakeholders, such as the hospital discharge, community learning and participation teams attend on invitational basis. In future, the Council aims to expand the forum to include all providers of housing for older people.

The forum is an opportunity to share best practice in both housing and care and support services. The group works together to address system and process blockages, manages the joint referral process and discusses solutions for complex cases. They also work collaboratively to develop best practice, discussing future models of working – such as how to proactively maintain a balance of resident needs within their schemes.

Providers are encouraged to raise any challenges within their schemes that would benefit from collaboration or improved links with other areas and work with the Council to find solutions.

In early meetings, the group identified access and referral as an issue for both providers (to fill property voids) and for the Council (who were not able to prioritise referrals for voids). The Council and providers worked together to develop a joint access and referral process. As a result, the Council holds a waiting list, completes only one application form and is offered first refusal on all voids.

The providers forum is now also used as a panel arrangement to regularly review difficult cases to identify solutions together.

## Value for money in supported housing

As well as helping to improve people's quality of life by supporting them to live independently, supported housing provides significant benefits to the country and the wider public sector. Every pound spent on supported housing contributes to positive outcomes for individuals, which can lead to more effective use of resources for the NHS, local councils and the wider public sector: for example, through lower health and social care costs, lower pressure on police, probation and prison services and reduced homelessness and rough sleeping<sup>[footnote 3]</sup>. This in turn enables these services to deliver better outcomes for vulnerable groups.

### Case study: Aviary House reducing pressure on mental health services

Aviary House in North Solihull accommodates adults with a history of severe and enduring mental health needs through combined housing and onsite support. They aim to create a friendly, safe and supportive environment in which people can develop and improve their skills to live more independently.

Aviary House, run by Home Group, is commissioned by Solihull Metropolitan Borough Council and is home to 24 long-term residents. There are also four Step Up Step Down beds funded by the NHS, which offer short term accommodation and support to people with severe mental health needs.

This combined service model increases Aviary House's cost effectiveness by sharing staff across the SUSD and supported living. By reducing the need for hospital admissions and out of area placements, Aviary House delivered a net saving of £71,000 in 2017/18.

Most importantly, individuals reported a 52% improvement in their wellbeing after their stay in Aviary House.

"The Step Up and Step Down service offers people the time and space to recover from crisis delivering a therapeutic, effective, safe alternative to hospital for some people who would previously have been admitted. It has proven to be a very valuable resource to the NHS," explains Martin Luke, Manager at Birmingham and Solihull Mental Health Trust.

"We've seen real friendships form at Aviary House," adds mental health commissioner at Solihull Council, Julia Phillips, "Some SUSD clients have come back once they have recovered to volunteer within the scheme, and some meet up at various activities within the wider community. You really can't underestimate the positive impact of having a stable peer support group."

Health and local government teams work closely, sharing knowledge and information through project groups and regular meetings. Birmingham and Solihull Clinical Commissioning Group now plan to develop this model of service across Birmingham City.

Costs for rent and eligible services charges are transparent and reasonable.

Many people who live in supported housing are on a low income or benefits. For those who are eligible (subject to individual circumstances and current regulations), financial help with their housing costs, such as rent and eligible service charges, can be met through the welfare system. Funding is usually through Housing Benefit, which is administered by local councils on behalf of the Department for Work and Pensions (DWP). Local councils are responsible for administering Housing Benefit and determining whether the accommodation meets the criteria for 'specified' accommodation (including 'exempt' accommodation) and whether Housing Benefit can be paid to cover housing costs.

Housing costs for supported housing can be higher than normal housing due to space and accessibility requirements, greater wear and tear, additional design features and fittings for people with complex needs and the need to be close to amenities or in some cases a specific location. However, it is important that housing costs in supported housing are reasonable, appropriate and represent value for money. For example, service charges must represent the actual cost of the services and it should be clear what each charge covers.

There are several actions which can be taken to help ensure fair value in supported housing.

The DWP provides [guidance for local councils](https://www.gov.uk/government/collections/housing-benefit-and-council-tax-benefit-manual) (<https://www.gov.uk/government/collections/housing-benefit-and-council-tax-benefit-manual>) to assist with the assessment of Housing Benefit claims in addition to the relevant Housing Benefit legislation. This includes the assessment of whether housing costs are eligible and reasonable.

Local councils have powers under Housing Benefit Regulations 2006 (Regulation 13) to challenge rents which are not reasonable. Therefore, in the interest of tenants, providers and Revenues and Benefits teams should consider working together to establish what costs are reasonable for rent and eligible service charges in each case. Regular communication between local councils and providers during the claim assessment process will deliver the best outcome for the resident.

Housing associations, charities and landlords (including their managing agents) should ensure they are able to provide clear information on how charges have been set, respond to any queries promptly and cooperate fully with local council Revenues and Benefits teams to avoid delaying claims. Providers should have clear rent setting policies in place as appropriate.

Local councils have powers under the Housing Benefit Regulations 2006 (Regulation 86) to require information in relation to a Housing Benefit claim from benefit claimants. This can include following up with a claimant on the level and type of support they are receiving. Due to the vulnerable nature of the majority of claimants in supported housing, it may be beneficial to request this information from a third party or someone acting on behalf of the claimant.

## Engaging with providers

There are many ways in which local councils can engage with providers to ensure supported housing is high quality and represents value for money within the scope of Housing Benefit regulations. Each local council can choose how best to achieve this aim in their area. The example below from Sunderland Council is one approach and can contribute to ensuring that people's needs are met in their supported housing, and that the welfare system is funding only high quality, value for money accommodation.

### Case study: Sunderland Council

Deborah Younger, Assistant Benefits Manager at Sunderland City Council, has been working in Housing Benefit for over 30 years. Her team assess Housing Benefit claims in line with regulations and follows the best practice below for supported housing. Any of these tools may be used as part of a reasonable assessment of Housing Benefit claims to ensure compliance with regulations. There is no expectation that a local council will make use of all these tools.

The team does not use all tools for every scheme but select the most appropriate on a case-by-case basis.

- Visit as many new schemes as possible. This helps them to understand costs and to especially identify where costs are inappropriate or illegitimate.
- Ask for evidence and methodology for costs, where figures don't appear reasonable.
- For newly built schemes, ask for build costs where the core rent charge is high.
- Share information with other local authorities. Where providers have a presence in other areas, the team contacts other local authority to see if they have had any concerns and to discuss charges for rent and service charges, particularly for housing management and staffing costs.
- Verify that rents are set following the rent standard and whether the provider is eligible for an exemption from the rent standard. This can be taken to the Regulator of Social Housing.
- Look into intensive housing management costs to determine whether they are justifiable and reasonable ensuring that there are no costs relating to support within the charge. Ask for time-in-motions of tasks carried out by the appropriate staff where costs are excessive.
- Speak to service users to discuss the support they are getting, whether it is appropriate and required and is sufficient for their needs.



- Ask for proof of funding for support costs to ensure that providers have a separate funding stream for support other than rent.
- Review staff structures, job descriptions, hours worked and salaries.
- Request the Service Level Agreement between the Landlord and Care Provider to determine what responsibility each party has for care, support and supervision to determine exempt accommodation status amongst other things.
- Where a core rent comprises a charge for a lease to a Superior Landlord, request the lease agreement.
- Request invoices where they seem to be excessive and to verify who is responsible for paying these costs.
- Maintain a database to compare core rents and service charges between providers.
- Work closely and liaise with various Departments (Adult Social Care Commissioning Team, Housing Strategy and Housing Options) within Sunderland City Council, particularly on new schemes that are proposing to come into the City. Joint meetings are held with the Service Provider, where appropriate, and rent levels agreed, wherever possible, before the scheme goes live.

If there are any areas that raise cause for concern, Sunderland City Council would:

- restrict the charges that are excessive where there is insufficient evidence or information held to justify the costs
- make payments on account where a final decision cannot be made as information and evidence is outstanding
- refuse to pay Housing Benefit and signpost to claim housing costs via Universal Credit (unless an exemption applies) whilst on-going enquiries are being made whether support is provided and is more than minimal
- suspend payments where it is felt that this is the appropriate action to take
- raise their concerns with the Rent Regulator where it has not been demonstrated that the rent standard has been adhered to

Local council Revenues and Benefits departments and commissioners share knowledge and data to benchmark schemes.

Sharing knowledge and data internally and between neighbouring authorities to benchmark the level of rent and service charges typically required in different types of supported housing schemes can enable Revenues and Benefits teams to compare costs and equips them to identify and challenge where these are unreasonable. This will require a partnership approach between key stakeholders; teams may also seek input and knowledge from trusted providers.

Local councils could particularly consider identifying those parts of the supported housing sector which can represent a higher intensity of client need and thus

higher costs, for example specialised supported housing for people with acute conditions or for people with complex needs. Commissioners and Revenues and Benefits teams could work together to understand the reasons for legitimate higher costs.

The size and age of a scheme, as well as the needs of the client group for which it was developed, will all impact upon costs. For example, the availability of grant funding impacts development costs; while accommodation developed with government capital grant funding is subject to the Rent Standard, as are some other types of supported housing. Housing developed to bespoke specifications for an individual or location also incurs additional costs. Rent charges for schemes should be based on the initial cost of development and the services provided. The cost of the development should be recovered over a reasonable period of time to avoid rents being unreasonably high for residents. Partnership work can aim to achieve a clearer understanding of these variations within different parts of the sector.

Providers could then be asked to provide further information and supporting evidence where it is not clear whether the costs involved are proportionate to the intensity of need of the client group or the accommodation and housing services provided.

### **Case study: Supported Housing Sector Scorecard**

The supported housing sector is committed to providing high quality accommodation which improves the quality of life of their tenants. They are also committed to offering good value for money.

To achieve this, supported housing providers have joined together to develop a Supported Housing Sector Scorecard. The scorecard will establish a standard set of indicators which will enable housing associations and supported housing providers to benchmark costs, performance and supported housing supply against their peers.

This work expands upon the Sector Scorecard, which benchmarked wider housing association performance in social housing, and will deliver several benefits for supported housing.

The scorecard will provide a reliable and comparable set of results that organisations can use to understand their own performance in the context of supported housing provision. This will support the sector to work with and learn from each other.

The insight will also enable supported housing providers to ensure they are delivering an efficient and value for money service that meets best practice in terms of improved customer outcomes. This will help to drive performance improvements.

“The Supported Housing Sector Scorecard is a vital step towards improving quality and value for money in all supported accommodation. It will allow us to learn from our diversity, understand and evidence the positive impact we have

for our customers, and deliver the best service we can, as efficiently as possible,” said Rachael Byrne, Chair of the Supported Housing Sector Scorecard.

The Working Group includes 15 national and regional providers representing a range of client groups across Supported Housing. They have developed an initial set of indicators, covering current and new supply of supported housing, cost per unit, levels of occupancy, rents and customer satisfaction. The full pilot will be launched in September 2020 across the supported housing sector.

Local councils can consider using their existing powers relating to both housing, health and safety and Housing Benefit to enforce minimum housing standards in supported housing and to ensure housing costs are not excessive.

Revenues and Benefits teams should be satisfied that accommodation and support provided meet the tests within Housing Benefit regulations and represent value for money. If not satisfied, they have the power to take further action, including visiting the premises or challenging claims.

### **Case study: Hull City Council's Supported Accommodation Review Team**

Hull has around 600 properties providing short-term supported accommodation for around 1500 people. In 2018, Hull City Council launched a pilot project to address concerns around the proliferation, clustering and poor quality of supported housing and in April 2019, the Supported Accommodation Review Team was formed.

In Year 1, the team conducted 148 Housing Inspections and 114 tenant Support Reviews to:

- Assess housing and property management standards to ensure provision of safe, well managed and maintained accommodation.
- Review the support / charges to ensure that the support is “more than minimal”; designed to facilitate supported accommodation properties within local communities; and helps individuals to move on to independent accommodation where appropriate.

This has resulted in the removal of 251 housing hazards (HHSRS), and 108 letters have been issued to support providers, requiring and achieving significant improvements in tenant support.

Improvements in property condition and tenant support are also being driven by collaborative working with Providers through the publication of Hull's Supported Accommodation Provider Charter in March 2020, and the delivery of free training, relating to housing hazard assessment, HMO management and tenant support, provided in the Team's first year, to 161 staff members representing 26 Supported Accommodation Providers.



The Supported Accommodation Review Team also performs a “gatekeeper role” in partnership with the Housing Benefit Service during the new Scheme application process, to ensure that sub-standard Schemes are not given exempt status, and to provide an opportunity for Schemes which do not meet minimum standards to make appropriate improvements.

### Leo's story

Leo\* moved into supported housing in Hull after leaving care at age 17. When the Supported Accommodation Review Team (SART) officers carried out a support review with Leo, he raised a wide range of concerns. This included a lack of appropriate support from the accommodation provider; poor housing conditions including a lack of hot water and heating; and an unsecured property with real risks of entry by intruders into the property. These issues were having a negative impact on Leo's well-being, physical and mental health.

The provider was initially unresponsive when SART raised these issues, so the team acted quickly. By engaging with the provider's senior management they were able to address the urgent housing conditions and improve the support offered to Leo. This prevented the issues from escalating further and restored a positive support relationship between Leo and the provider.

The team also collaborated with local authority and partner services – including Local Authority Adult Social Care, Children's Services specialists, Safeguarding, Housing Officers and out of area Social Services. As a result, Leo received a structured support plan, was helped to request a care leaver's personal assistant and accessed mental health specialists. The team also found that Leo was ready to explore a move-on package to more independent living, which hadn't been seen as a possibility before.

\*Names have been changed

### Case study: Enforcement in Birmingham

Birmingham's approach to enforcement in the exempt supported accommodation has become increasingly important with the sector's rapid growth.

Following a study undertaken on behalf of the Birmingham Safeguarding Adults Board, the Council has:

- Established a Multi-Agency Task and Finish Group to consider issues relating to the exempt sector and to develop an action plan for delivery.
- Developed a set of Quality Standards, which Providers can work towards meeting and become accredited.
- Developed a Charter of Rights for Citizens in supported exempt accommodation, commissioned through Spring Housing.

- Set up Multidisciplinary Action Planning meetings, bringing together key partners such as Adult Safeguarding, Planning, Fire Service and Police. When complaints and safeguarding alerts are received, the group shares intelligence and agrees actions and responsibility between agencies.

In April 2019 a pilot enforcement team was established, and following its success, has been fully incorporated into the Benefits Service.

The team's preventative approach supports partners to improve standards. One landlord, who continuously failed to provide evidence of support in an ongoing review, was issued with written correspondence that their claims could be refused if they did not comply. The landlord is now working with Birmingham to provide the required information.

The team also reviews providers where there are concerns around governance and finances. Since April 2020 the team have reviewed 9 landlords who supply supported accommodation and are undertaking 5 further reviews.

The team reviews individual claims and so far, over 2,100 claims have been identified as incorrectly or fraudulently claimed Overpaid Housing Benefit. This has recovered over £1.1 million for the Council.

Birmingham provides feedback and evidence to the Charity Commission and Regulator for Social Housing to support their work, and submit fraud referrals to DWP.

Both local councils and providers ensure they take a consistent approach to administration and information sharing.

We would encourage local councils to share information across teams, including supported housing commissioners and Housing Benefit teams. This includes teams being aware of the circumstances and conditions of any discussions and agreements with providers.

We suggest that providers ensure they are transparent in their communication with local council teams, ensuring they engage them about any plans to develop new schemes and the costs associated with them.

### **Legislation: quick guide**

Local authorities are required by the Housing Act 2004 to keep the housing conditions in their area under review and have duties and powers to take enforcement action to deal with health and safety hazards. More specifically, local authorities have powers under the Housing Act 2004 (Section 4) to inspect residential properties in their area, including supported housing, to determine if there are health and safety hazards in the property. See [statutory guidance on enforcement](https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-enforcement-guidance-housing-conditions) (<https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-enforcement-guidance-housing-conditions>).

Based on feedback from housing inspection officers, local authorities may also wish to consider relying on their powers under the Housing Benefit Regulations 2006 (Regulation 86) to request information from benefit claimants in relation to a Housing Benefit claim, to collect further information to test whether the rent and eligible service charges being claimed are reasonable and justified

### **Case study: Nottingham City Council's Good Practice Guide: 'The Nottingham Way'**

In 2019, Nottingham City Council launched its [Good Practice Standards Guide](https://www.nottinghamcity.gov.uk/information-for-residents/housing/private-rented-accommodation/landlords-and-tenants-before-a-tenancy/landlord-standards-and-accreditation/) (<https://www.nottinghamcity.gov.uk/information-for-residents/housing/private-rented-accommodation/landlords-and-tenants-before-a-tenancy/landlord-standards-and-accreditation/>) for the delivery of non-commissioned supported housing in Nottingham.

The guide was developed for two reasons:

1. The Council had identified an increase in the number of providers approaching the Council either opening new supported accommodation or proposing to provide supported accommodation; these were nearly always linked to claims for the 'exempt' rate of Housing Benefit.
2. The Council had received a number of enquiries about the standards expected of supported housing providers in the city, and had experienced cases of poor housing conditions where further action had to be taken.

The Council's Housing Strategy & Partnerships team worked collaboratively with the Safer Housing Team, Nottingham Revenues and Benefits, the Community Rehabilitation Company and the Probation Service to develop the Good Practice Standards Guide.

The guide is an informative publication which helps housing providers consider what they need to do to provide good-quality accommodation and support to citizens with specific needs or vulnerabilities.

The guide covers a variety of aspects including referrals, accommodation standards, tenancy agreements, partnership working, and safeguarding. It also signposts to further useful resources for tenants and providers.

It is envisaged that the Good Practice Standards Guide (Nottingham Way) will aid positive outcomes including:

- good, consistent quality of accommodation and support
- higher accommodation standards for those living in supported housing
- better outcomes for those being supported in this form of accommodation
- greater assurance about value for money for the Housing Benefit being charged
- enhanced relationships between the Council and local service providers

The guide has been distributed to existing providers in Nottingham and is shared with anyone making enquiries to start up a supported housing scheme.

The Council is currently following up with providers to assess the usefulness of the guide to date.

## Annex A: Checklist of accommodation standards and tenancy-related housing services in supported housing

This checklist is primarily for supported housing landlords and managing agents and sets out suggested standards for accommodation-related housing services that we would like to see applied in supported housing in England. It covers legal requirements, suggested minimum standards and what we consider constitutes best practice.

While the intended audience is primarily supported housing landlords and managing agents, we believe all organisations involved in supported housing delivery will find the list beneficial and a useful reference point, and would encourage:

- All providers across the sector to meet these standards and to set out how they meet these standards in their annual report to their stakeholders and residents.
- Board chairs and members to hold their executive teams to account on whether and how they are meeting these standards.
- Commissioners and referral agencies consider these standards when placing or referring individuals into supported housing accommodation.
- Local councils consider these standards when considering their housing enforcement strategies and approach.

We recognise that the supported housing sector is extremely diverse and serves a wide range of client groups with a variety of needs and requirements. This checklist can be considered with this in mind - discretion and common sense may be exercised where a guideline should not apply for a certain group or type of supported housing scheme.

### Supported accommodation – general expectations and suitability

#### Minimum legal requirements

Accommodation is safe and well maintained ([Sections 9A – 11 Landlord and Tenant Act 1985](https://www.legislation.gov.uk/ukpga/1985/70/contents) (<https://www.legislation.gov.uk/ukpga/1985/70/contents>)).

Landlords must ensure that their property, including any common parts of the building, is fit for human habitation at the beginning of the tenancy and throughout.

Landlords must ensure their property is free of hazards by which is meant any defect which poses a risk of harm to the health or safety of the occupiers.

Landlords must keep the structure and exterior of the property in repair and must keep the installations which provide water, gas, electricity, sanitation, heating and hot water, in proper working order.

For supported housing with commissioned support, the accommodation will need to comply with the accommodation standards set out by support commissioners. This may be higher than the minimum statutory standards in some cases.

### **Suggested minimum standards**

Housing is accessible, suitably located, appropriate and suitable to meet the needs of residents, including health, care and support needs.

Procedures and measures are in place to minimise risk and provide the best possible support to people in supported living settings in the context of the COVID-19 pandemic.

Accommodation is assessed by local council commissioners, referring bodies, and by providers and their partners (e.g. providers of support services), for its suitability in meeting the needs of the specific vulnerable residents being accommodated. The individual's views and aspirations are sought and considered in the assessment.

Housing staff demonstrate an understanding of supported housing services and be provided with comprehensive training, with regular refreshers on key issues, and appropriate learning and development opportunities for their role. They develop competencies relating to safeguarding, equalities and building safety. Staff are supported to acquire appropriate qualifications, where relevant.

All staff are suitably qualified or trained appropriately for the role they are in and encouraged to acquire appropriate and relevant qualifications by housing providers.

Staff are supplied with the appropriate PPE and training in COVID-19 measures and follow the Public Health England [guidance on PPE in residential care/support settings](https://www.gov.uk/government/publications/covid-19-how-to-work-safely-in-domiciliary-care) (<https://www.gov.uk/government/publications/covid-19-how-to-work-safely-in-domiciliary-care>).

Staff and residents are considerate of neighbours – external areas are kept clean and safe, and measures are in place to prevent and manage any anti-social behaviour.

### **Going further – suggested best practice**

Accommodation is located near to amenities and transport, supporting social inclusion.

There are efforts to engage the local community, for example over the standards of housing and housing services, or by allowing access to any facilities such as gyms, as appropriate.

Residents are empowered and supported to engage with neighbours and the local community if they choose to.

## Accommodation regulations and standards

### Minimum legal requirements

The buildings comply with local council standards or other statutory building and fire safety regulations and any other relevant wider applicable housing legislation.

The landlord must:

- check and maintain gas safety (Gas Safety (Installation and Use) Regulations 1998)
- ensure that furniture and furnishings comply with the regulations and are fire safe (Furniture and Furnishings (Fire) (Safety) Regulations 1988)
- fit smoke and carbon monoxide alarms (The Smoke and Carbon Monoxide Alarm (England) Regulations 2015)
- provide an Energy Performance Certificate (Energy Performance of Buildings (England and Wales) Regulations 2012)
- provide a copy of the [How to rent: the checklist for renting in England guide](https://www.gov.uk/government/publications/how-to-rent) (<https://www.gov.uk/government/publications/how-to-rent>)

Buildings comply with relevant accessibility regulations, including on accessible and adaptable dwellings (Access to and use of buildings: Approved Document M, vol. 1 and 2).

Accommodation is free from serious hazards, as assessed by the Housing Health and Safety Rating System.

Landlord complies with House in Multiple Occupation management duties and licences property if necessary.

Meet the standards set out in the 'Decent Homes Standard' if registered with the Regulator for Social Housing (or work closely with the Regulator to do so within an agreed timeframe if non-compliant).

### Suggested minimum standards

Meet the standards set out in the 'Decent Homes Standard', even if not registered with the Regulator of Social Housing. If accommodation does not meet the standard, we would encourage the provider to instigate a plan to achieve compliance over a reasonable specified timeframe and to monitor, assess and report regularly against progress.

Buildings are energy efficient – we recommend providers work towards a minimum target of Band C of the Energy Performance Certificate.



Landlord provides an Electrical Installation Condition Report (EICR), ensuring remedial works or further investigative works are carried out to remedy any 'C1', 'C2' or 'FI' classifications.

### **Going further – suggested best practice**

Comply with House in Multiple Occupation management duties and licensing standards even where the property is formally exempt from licensing on the basis of being owned or managed by a housing association or other provider registered with the Regulator for Social Housing.

Comply with the Code for Sustainable Homes, a single national standard for the design and construction of sustainable new homes.

Comply with Secured by Design, a police initiative that improves the security of buildings and their immediate surroundings.

For older people's housing, schemes comply with the Housing our Ageing Population Panel for Innovation (HAPPI) design principles.

Where appropriate for the client group, the scheme is designed and developed in line with Psychologically Informed Environment principles.

## **Housing facilities**

### **Minimum legal requirements**

Properties are appropriate size for the number of occupiers ([Housing Act 1985, Part X](https://www.legislation.gov.uk/ukpga/1985/68/part/X) (<https://www.legislation.gov.uk/ukpga/1985/68/part/X>); [Housing Act 2004, Part 1 and 2](https://www.legislation.gov.uk/ukpga/2004/34/contents) (<https://www.legislation.gov.uk/ukpga/2004/34/contents>)).

Staff make reasonable adjustments to accommodation to meet residents' needs, for example if a resident is disabled (Equality Act 2010).

### **Suggested minimum standards**

There are an adequate number of bedrooms. Except in emergency or short-term accommodation, unrelated adults are not expected to share bedrooms.

Living space for daily activities is appropriate for the size of the household. There is common space such as community rooms.

Accommodation provides residents with privacy and dignity, including private (as appropriate) space for dressing, showers, toileting, and accessible space for disabled users.

Storage is provided to keep residents' personal belongings safe.

### **Going further – suggested best practice**

Accommodation is welcoming and is designed to feel like a home, rather than an institution. Residents are consulted on changes to their spaces such as redecoration or use of communal areas.

Care is taken to consider additional facilities or spaces which can improve outcomes (e.g. communal areas or private spaces for meetings with support workers).

Clear signage where needed, such as to communal areas (e.g. gym).

## Housing safety and building condition

### Minimum legal requirements

Buildings are fit for human habitation ([Homes \(Fitness for Human Habitation\) Act 2018](https://www.legislation.gov.uk/ukpga/2018/34/contents/enacted) (<https://www.legislation.gov.uk/ukpga/2018/34/contents/enacted>)) with no hazards.

Buildings comply with relevant legislation on building maintenance and condition.

There are policies and procedures in place for risks related to fire, asbestos and Legionella (where appropriate).

### Suggested minimum standards

Buildings are well maintained, with all amenities in good working order. This includes:

- lifts
- appliances
- windows
- doors and locks
- lighting

Room temperatures are adjustable with appropriate heating/cooling systems. Residents can control heating within their homes.

There are clear procedures for residents to report issues.

Maintenance problems are addressed and fixed in a timely and responsive manner.

All repairs are followed up.

There are clear procedures and processes to address non-routine or emergency repairs.

Grounds are maintained in all seasons, with timely removal of ice and snow.

There are policies and procedures in place for risks including electrical safety and emergency planning.



Housing providers follow the Public Health England guidance for supported living settings.

Accommodation is built to high accessibility standards so appropriate additional adaptations are easy and affordable to install. This can include, as needed, functioning alarm points, e.g. call bells, which are tested and maintained regularly; grab rails in bathrooms, showers and toilets and anti-scalding controls, for example in accommodation for older people or people with learning difficulties

There are closed containers for disposal of sharp objects.

Trip hazards are managed - all stairways and halls are lit adequately, with handrails and non-slip rugs where needed.

Windows are fitted with plastic or safety glass (even where not required by building codes).

### **Going further – suggested best practice**

A planned programme is in place to minimise preventable deterioration of the buildings, accommodation, grounds, equipment and furnishings, and that all such are well maintained and in good working order. This includes a preventative maintenance and repair programme and schedule with regular inspections to check building and equipment conditions and to ensure repairs and servicing takes place.

Timescales for non-emergency repairs may be agreed with residents to create a more resident-focussed approach.

Housing and property managers examine the physical buildings on a regular basis to identify problem areas in safety and security.

Housing staff inspect property units whenever a new resident moves in, and at least annually.

Each property has a safety plan, with a clear reporting line for responding to building emergencies. Residents are engaged on issues related to safety through existing or dedicated committees including residents, housing and support staff.

## **Tenancy and licence agreements**

### **Minimum legal requirements**

All housing-related fees are listed, including tenancy fees, deposits, management fees and service charges ([Landlord and Tenant Act 1985](https://www.legislation.gov.uk/ukpga/1985/70/contents) (<https://www.legislation.gov.uk/ukpga/1985/70/contents>)).

Tenants are not evicted without proper procedure or legal proceedings.

Residents are never to be charged for normal wear and tear. Residents may be charged where the tenant has caused extensive damage to a unit.

Costs for rent and eligible services charges are transparent and reasonable

### **Suggested minimum standards**

Residents in supported housing have the most secure form of tenancy compatible with the purpose of the housing and the client's needs and circumstances. The tenancy agreement or license is provided quickly.

The terms of tenancies and licences are fair and transparent and take into account the housing needs and aspirations of residents.

Residents' rights, choices and control over their homes are respected, while taking into account the needs of other residents and any access rights which may be required.

Records are kept for each resident, relating to housing fees, their deposit, rent arrears, any accommodation issues, and notes on any proposed eviction or transfer.

There are clear procedures which set out the circumstances when the person can be moved on, e.g. if their care needs change

There are clear procedures for eviction, with a focus on working with the individual to avoid or prevent eviction where possible. Providers work to find solutions to sustain accommodation.

### **Going further – suggested best practice**

All residents are helped by housing staff to understand their rights and responsibilities under the tenancy.

Housing staff assist residents with managing rental payments and rent arrears where needed.

There are procedures in place to prevent the need for eviction ever arising, where possible.

## **Resident communication and engagement**

### **Minimum legal requirements**

In HMOs, name and contact details of the landlord must be made available to residents and clearly displayed ([The Management of Houses in Multiple Occupation \(England\) Regulations 2006](https://www.legislation.gov.uk/uksi/2006/372/contents/made) (<https://www.legislation.gov.uk/uksi/2006/372/contents/made>)).

### **Suggested minimum standards**

Communication and information are clear, easy to follow and appropriate to the needs of residents.

Name and contact details of the landlord are made available to residents and clearly displayed.

Clear information is provided to residents on how their rent and service charges are set.

House rules, which respect residents' rights and independence, are in place and clearly displayed. The rules are developed with input from residents where possible.

Protections are in place to protect residents from anti-social behaviour from other residents, as well as from abuse by staff or visitors.

Clear, simple and accessible complaints and redress procedures are in place.

### **Going further – suggested best practice**

Staff actively seek resident feedback on the housing and housing services, ideally through a range of methods such as informal chats, meetings, surveys and suggestion boxes.

Prospective residents are provided with an information pack including information on all rents and service charges, including notice periods for increases, and procedures for complaints and redress and dispute resolution. The pack could also list all routines and house rules.

All written material for residents is in plain English and staff are able to help explain if needed.

There is assistance for residents whose first language is not English, who are non-verbal or who have limited understanding.

Prospective and new residents are shown around and orientated on first arrival, including providing details of the move-in conditions and emergency exits.

A nominated person (e.g. family member) is able to be appointed to assist with all accommodation issues.

## **Annex B: Related strategies, guidance and useful links**

While the standards set out in this National Statement of Expectations are not statutory requirements, they are suggested good practice. They should complement other government strategies and guidance which aim to improve support for client groups using supported housing, some of which are subject to specific statutory requirements which local councils must have regard to.

These include:

- [Homelessness code of guidance \(https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities\)](https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities) suggests that local councils should review the supply and demand for a range of suitable accommodation including supported housing for people who are homeless or at risk of homelessness
- Joint Health and Wellbeing strategies and Joint Strategic Needs Assessments as required by the Health and Social Care Act 2012 and the Local Government and Public Involvement in Health Act 2007
- Adult safeguarding strategies as set out in the Care Act 2014
- Local Plans to set out local planning policies and identifies how land is used
- [Ending violence against women and girls \(VAWG\) strategy \(https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020\)](https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020)
- [Keep on caring strategy \(https://www.gov.uk/government/publications/keep-on-caring-supporting-young-people-from-care-to-independence\)](https://www.gov.uk/government/publications/keep-on-caring-supporting-young-people-from-care-to-independence) for care leavers
- [Transforming care strategy \(https://www.england.nhs.uk/learning-disabilities/care/\)](https://www.england.nhs.uk/learning-disabilities/care/) to improve health and care services so that more people with a learning disability and/or autism can live independently in the community, with the right support

There is also a wide range of guidance and examples from the sector and other organisations that work on supported housing and support the groups accessing supported housing. These include:

## Useful guidance

- [Housing Benefit and Council Tax Benefit Manual \(https://www.gov.uk/government/collections/housing-benefit-and-council-tax-benefit-manual\)](https://www.gov.uk/government/collections/housing-benefit-and-council-tax-benefit-manual)

## Planning supported housing

- [Guidance for councils on preparing planning policies for older and disabled people \(https://www.gov.uk/guidance/housing-for-older-and-disabled-people\)](https://www.gov.uk/guidance/housing-for-older-and-disabled-people)
- [Principles of good commissioning \(https://www.nao.org.uk/successful-commissioning/general-principles/principles-of-good-commissioning/\)](https://www.nao.org.uk/successful-commissioning/general-principles/principles-of-good-commissioning/)
- [Developing and implementing local extra care housing strategies \(http://www.housingcare.org/information/detail-2294-developing-and-implementing-local-extra-care-housing-strateg.aspx\)](http://www.housingcare.org/information/detail-2294-developing-and-implementing-local-extra-care-housing-strateg.aspx)
- [The extra care housing toolkit \(https://www.housinglin.org.uk/Topics/type/Extra-Care-Housing-Toolkit/\)](https://www.housinglin.org.uk/Topics/type/Extra-Care-Housing-Toolkit/)
- [Strategic housing for older people toolkit \(https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPv2/\)](https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPv2/)
- [Building the right home: guidance for commissioners of health and care services for people with learning disabilities and/or autism \(https://www.england.nhs.uk/learningdisabilities/wp-content/uploads/sites/34/2015/11/building-right-home-guidance-housing.pdf\)](https://www.england.nhs.uk/learningdisabilities/wp-content/uploads/sites/34/2015/11/building-right-home-guidance-housing.pdf)

## Existing local authority needs assessments and housing strategies

- [London Borough of Haringey: Supported housing review](https://www.minutes.haringey.gov.uk/documents/s91957/Supported%20Housing%20final%20report.pdf)  
(<https://www.minutes.haringey.gov.uk/documents/s91957/Supported%20Housing%20final%20report.pdf>)
- [York: Supported housing strategy 2014 to 2019](https://www.york.gov.uk/downloads/download/375/york-supported-housing-strategy-2014-to-2019)  
(<https://www.york.gov.uk/downloads/download/375/york-supported-housing-strategy-2014-to-2019>)
- [Hertfordshire County Council: Ten year supported accommodation strategy](https://www.hertfordshire.gov.uk/media-library/documents/about-the-council/084022-accommodation-strategy-2017-27-nov-2018-final-for-publication.pdf)  
(<https://www.hertfordshire.gov.uk/media-library/documents/about-the-council/084022-accommodation-strategy-2017-27-nov-2018-final-for-publication.pdf>)
- [Ealing Council: Supporting people strategy](https://www.ealing.gov.uk/downloads/file/726/supporting_people_strategy)  
([https://www.ealing.gov.uk/downloads/file/726/supporting\\_people\\_strategy](https://www.ealing.gov.uk/downloads/file/726/supporting_people_strategy))

## Standards in supported housing

- [Associated Retirement Community Operators \(ARCO\) consumer code](https://www.arcouk.org/arco-consumer-code)  
(<https://www.arcouk.org/arco-consumer-code>)
- [REACH Standards: REACH support for living](https://paradigm-uk.org/what-we-do/reach-support-for-living/) (<https://paradigm-uk.org/what-we-do/reach-support-for-living/>)
- [Fire safety in specialised housing](https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/NFCC%20Specialised%20Housing%20Guidance%20Copy.pdf)  
(<https://www.nationalfirechiefs.org.uk/write/MediaUploads/NFCC%20Guidance%20publications/NFCC%20Specialised%20Housing%20Guidance%20Copy.pdf>)
- [Housing our Ageing Population Panel for Innovation \(HAPPI\) design principles](https://www.housinglin.org.uk/Topics/browse/Design-building/HAPPI/)  
(<https://www.housinglin.org.uk/Topics/browse/Design-building/HAPPI/>)
- [National design guide: planning practice guidance for beautiful, enduring and successful places](https://www.gov.uk/government/publications/national-design-guide) (<https://www.gov.uk/government/publications/national-design-guide>)
- [Psychologically informed services for homeless people: good practice guide](https://eprints.soton.ac.uk/340022/1/Good%2520practice%2520guide%2520-%2520Psychologically%2520informed%2520services%2520for%2520homeless%2520people%2520.pdf)  
(<https://eprints.soton.ac.uk/340022/1/Good%2520practice%2520guide%2520-%2520Psychologically%2520informed%2520services%2520for%2520homeless%2520people%2520.pdf>)

## COVID-19 guidance for providers of supported housing

- [COVID-19: how to work safely in domiciliary care in England](https://www.gov.uk/government/publications/covid-19-how-to-work-safely-in-domiciliary-care)  
(<https://www.gov.uk/government/publications/covid-19-how-to-work-safely-in-domiciliary-care>)
- [COVID-19: guidance for supported housing providers](https://www.gov.uk/government/publications/supported-living-services-during-coronavirus-covid-19)  
(<https://www.gov.uk/government/publications/supported-living-services-during-coronavirus-covid-19>)
- [COVID-19: guidance for hostel or day centre providers of services for people experiencing rough sleeping](https://www.gov.uk/government/publications/covid-19-guidance-on-services-for-people-experiencing-rough-sleeping) (<https://www.gov.uk/government/publications/covid-19-guidance-on-services-for-people-experiencing-rough-sleeping>)

- [COVID-19: management of staff and exposed patients or residents in health and social care settings \(https://www.gov.uk/government/publications/covid-19-management-of-exposed-healthcare-workers-and-patients-in-hospital-settings\)](https://www.gov.uk/government/publications/covid-19-management-of-exposed-healthcare-workers-and-patients-in-hospital-settings)

## Footnotes

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1. Where the criteria for “specified accommodation” (including exempt accommodation) are met. See [Funding for supported housing: government response to two consultations \(https://www.gov.uk/government/consultations/funding-for-supported-housing-two-consultations\)](https://www.gov.uk/government/consultations/funding-for-supported-housing-two-consultations).
2. Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended).
3. Ashton T and Hempenstall C (2009), [Research into the financial benefits of the Supporting People programme \(https://www.gov.uk/government/publications/research-into-the-financial-benefits-of-the-supporting-people-programme-2009\)](https://www.gov.uk/government/publications/research-into-the-financial-benefits-of-the-supporting-people-programme-2009), Department for Communities and Local Government

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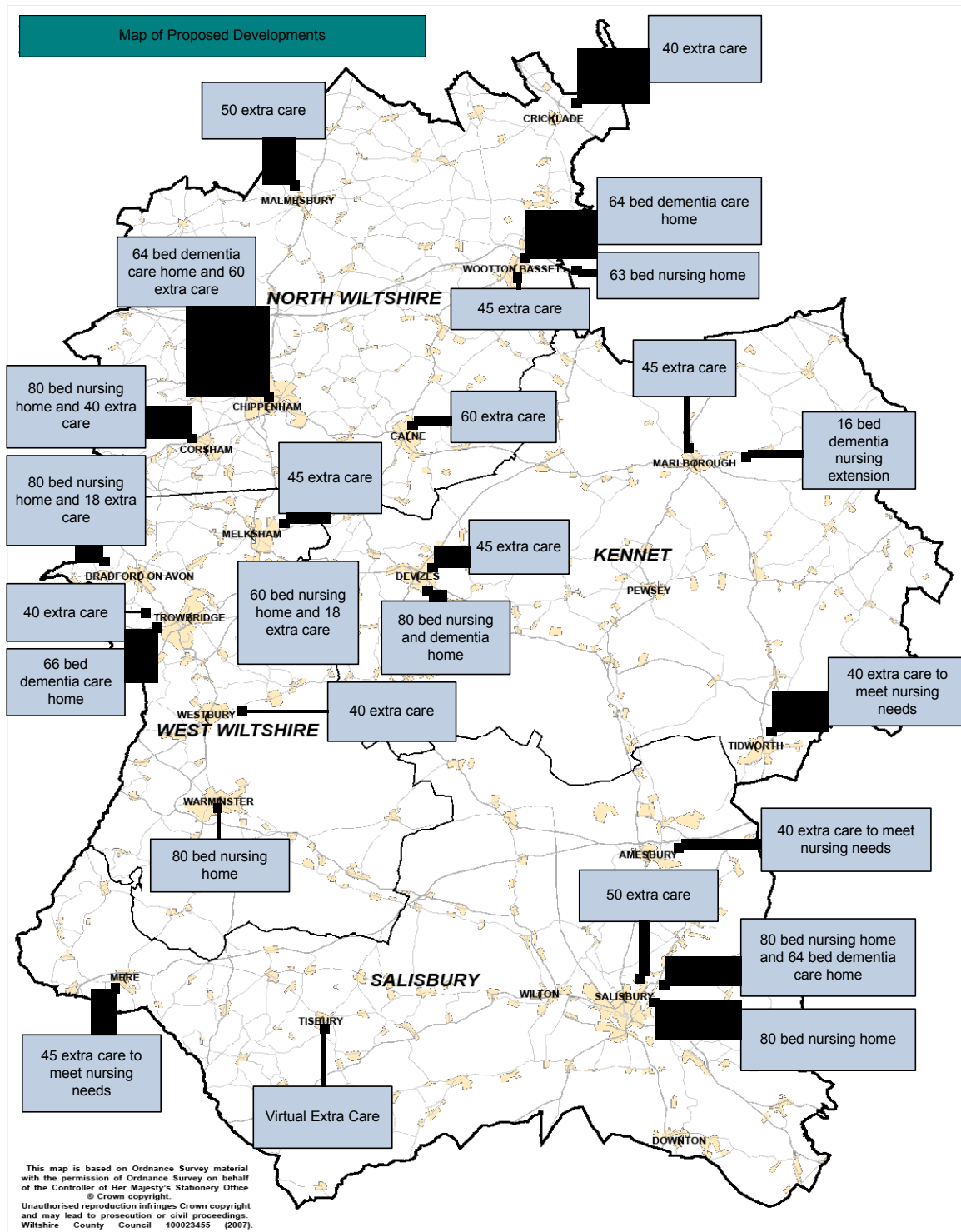
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# Wiltshire's Older People Accommodation Development Strategy – revised version



**December 2010**

# **Wiltshire Council Older People's Accommodation Development Strategy – Meeting Future Needs in Partnership**

## **Background and Context**

Wiltshire County Council established an Older People's Accommodation Partnership with the aim to develop a strategy and financial model for the provision of older people's accommodation over the next 5-10 years, and then to work in partnership to deliver this strategy.

The Wiltshire Older People's Accommodation Strategy (**WOPAS**) was completed in 2008 following extensive research and data collection by Peter Fletcher Associates.

The brief comprised of 7 elements broken down into 2 phases.

### **Phase 1:**

1. Data analysis necessary to forecast demand for older people's accommodation
2. To assess the appropriateness, demand for, and sustainability of existing older people's social housing
3. To identify the existing and planned provision of residential and nursing care homes and assess their sustainability
4. To quantify the existing and planned provision of older people's housing in the private sector
5. To forecast the future accommodation requirements of all types of older people's housing

### **Phase 2:**

6. To propose how the future accommodation requirements can be met, including the provision of a data model that can be used by the Council to adjust the forecast as factors change
7. To provide development and financial assessments of a number of potential sites that may be appropriate for meeting the identified accommodation needs

The main overarching aim subsequently identified by the strategy is **“.....to develop a whole system approach that supports a move to shift services upstream, and to reduce pressure on the hospital and care home system.”** The strategy goes on to identify the need to:

- Support more older people at home or in supported housing settings
- Develop a more financially efficient assessment and care management service
- Invest further in other preventative services

The strategy resulted in some 53 specific recommendations from which the Accommodation for Older People Strategy Board (**AOPSB**) agreed 22 priority recommendations and developed a set of 6 overarching principles and 6 key areas of focus which would be the means to implement those recommendations.

The 6 Overarching Principles are:

- Integrated System
- Housing Link
- Project Management
- Provider Forums
- Open Partnership
- Service Users

The 6 areas of focus are:

- Preventative Model/Home Improvement Agencies
- Extra Care Housing
- Out of Hours
- Floating Support/Sheltered Housing
- Dementia/Mental Health
- Learning Disability

The recommendations prioritised by AOPSB require a whole system review of the way that older people's accommodation is provided, managed and funded and, by necessity includes a review of the appropriateness of the current built asset (the care homes/residential homes and other associated stock) in terms of:

- Accommodation Standards – is it “fit for purpose” for 21<sup>st</sup> century living?
- Current Occupation types and forecast of future demand in the short, medium and long terms?
- Are there opportunities for rationalisation?
- Is the location right?
- Is the building environmentally efficient?
- Is the stock managed efficiently and to the appropriate standards and are the right support services in place?
- Is the tenure mix right to meet the needs of the future population?
- Can the stock be improved or used in a different way and are there other assets such as land that can be used in different and better ways?
- Can we work with our partners differently to achieve better outcomes?

In January 2010, an overview of the key principles of the proposed development strategy to respond to these challenges concluded with the following overarching **Strategic Outcomes** being developed:

- Increased number of nursing and specialist dementia care homes
- Reduced number of residential homes – aspirational aim to not commission any general residential beds by 2015

- Creation of 3 locality centres of excellence for rehabilitative step down and specialist dementia services
- Support more people to remain in their own homes by providing greater emphasis on preventative services, especially telecare
- Substantial development of extra care housing
- Management of future revenue and capital funding requirements

## Drivers for Change

In order to understand the requirements of a successful Older People's Accommodation System, PFA undertook an extensive analysis of the factors that will affect the provision of that accommodation over a 5 to 10 year period. PFA examined national and local policy and business drivers, demographic change and the current and planned future supply of accommodation. A brief summary of the key issues and findings follows and a copy of the full strategy is available at upon request.

### National Context

National policy has traditionally focussed on the needs of frail older people and the services required to support them and in health and social care, most resources are targeted on those with the most severe needs. The focus is changing; national policies now seek to support older people to live life to the full, to remain independent, healthy and active. This represents a shift from dependency and deficit to well being and independence.

The various policies taken into account included:

- ***Think Local, Act Personal – Next Steps for Transforming Adult Social Care, November 2010***
- ***Putting People First***
- ***Putting People First – Use of Resources in Adult Social Care, 2009***
- ***Housing Green Paper***
- ***National Housing Strategy for an Ageing Society***
- ***Commissioning Framework for Health and Wellbeing***
- ***National Dementia Strategy.***
- ***Department of Health White Paper Our Health Our Care Our Say, 2006***
- ***A Sure Start to Later Life 2006***

### Local Policy Context

Wiltshire has a number of specific strategy documents on older people's services as well as a number of other publications which reference older people's services including:

- ***A Strategic Framework for Older People's Services in Wiltshire***
- ***Wiltshire County Council Services for Older People Service Plan 2006-09***
- ***Strategic Review of Housing Related Support for Older People in Wiltshire***
- ***Community Strategies***

- ***Local Area Agreements***
- ***Extra Care Housing Strategy***
- ***Report on Delayed Transfers of Care Project, October 2006***
- ***A Strategic Framework for Mental Health Services in Wiltshire 2007-2012***
- ***Wiltshire Primary Care Trust Urgent Care Strategy 2007 – 2010***
- ***5-Year Strategy for Supporting People Services in Wiltshire***

Some common priorities, aims and objectives in these documents include:

- Person-centred planning and personalised care
- Increasing Direct Payments
- Promotion of independent living and technology to assist in this process
- More preventative services
- Involvement of older people in the decision-making process
- Safe and affordable transport services
- Increasing Extra Care provision
- Supporting flexible retirement and learning opportunities
- Shifting of mental health services for older people from inpatient to community-based services
- Older people with dementia to have their needs met in generic services wherever possible and appropriate
- A falls prevention strategy
- Both residential and nursing homes need the support of multi-professional community services to support older people with complex needs
- There is a need for specialist community mental health teams
- There should be improved access to respite services and other support for carers
- Health services should take a 'whole system approach' with 'money following the patient'
- Achieving a reduction in costs as part of the national efficiency agenda

## **Housing**

Wiltshire Council has recently commenced a major review of the Council's Housing Strategy. The review recognises that the Council faces a number of difficult challenges, one of which is older people and the aging population with the associated issues outlined above.

The Housing Service also recognises that in future it will be operating with reduced resources, particularly in terms of Homes and Communities Agency Social Housing Grant whilst still meeting the housing needs of residents across all tenures.

The Council has established, through working groups and the multi stakeholder Housing Strategy Board, four priority themes to shape the overall vision of the Housing Strategy. The themes are:

- **Lives not Services**
  - Working Together in Partnership
  - Promote Independent Living

- Stronger More Resilient Communities
  - Flexibility/Adaptability/Choice
  - Sustainable Communities
- Reducing Our Environmental Impact
  - Environmentally sustainable, for the life of the strategy but also for the future
  - Energy Efficiency
- Meeting Housing Need
  - Ensuring there is an adequate supply of good quality housing of all types and tenures

The needs of older people run across all of the themes identified and Community Services will continue to work with the strategy development team to ensure that the needs of older people are taken into account as the strategy develops.

### **Forecasting Demand – Demographic Change (2007)**

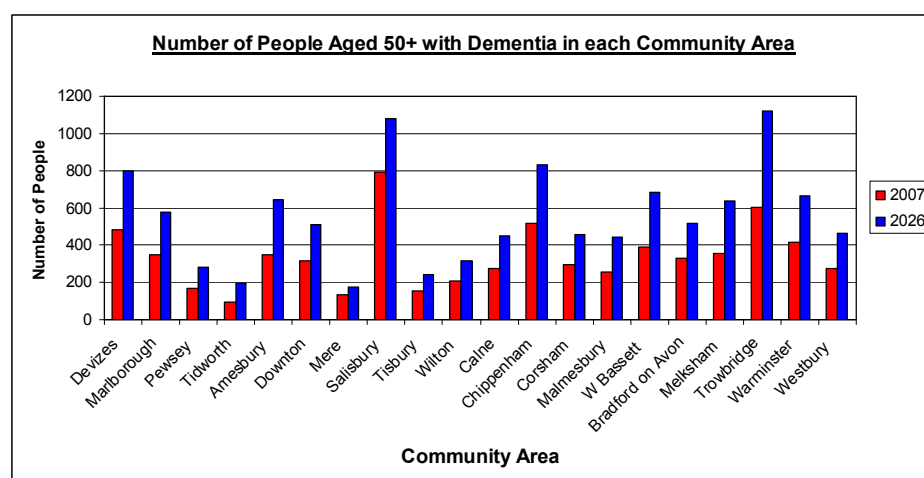
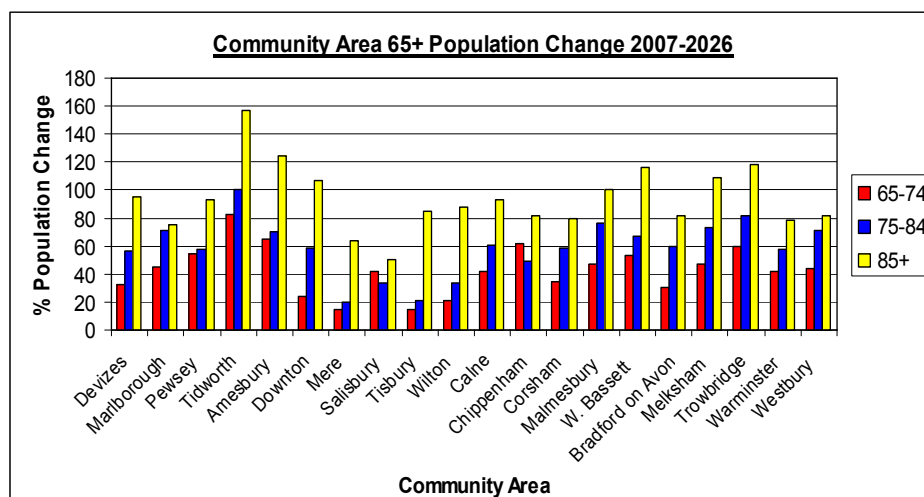
The following demographic projections are based on data collected in 2007-08, at which point demographic change was identified as a major driver for the Council:

- There are 165,730 people in Wiltshire aged 50+. This is around 36.6% of the total population of Wiltshire
- There are 78,690 people aged 65+, around 17.4% of the total Wiltshire population
- There is a significant growth in the older population across the county, but within this considerable variation across the community planning areas that needs to be factored in when planning future accommodation based and other services
- For Wiltshire as a whole, the largest population change is for the 85+ age group, which is projected to rise by 61.7% between 2007 and 2021. The projected change for the 85+ age group is much higher than for the 65-74 and the 75-84 age groups.
- Deprivation - In the Index of Multiple Deprivation 2004, none of Wiltshire's 281 Super Output Areas (SOAs) ranked among the most deprived 10% in England. 3 SOAs are among the most deprived 20% nationally, 2 in West Wiltshire (both in Trowbridge) and 1 in Salisbury districts (in the city of Salisbury).
- Dementia - Wiltshire can expect to see 59% more cases of the disease by 2025 which is higher than the growth in England as a whole. There is a high level of variation in terms of the numbers of people who could potentially develop dementia amongst the different community areas during this period, from 33% (Mere) to 107% (Tidworth).
- Learning Disability – There are estimated to be 7,000 adults with a learning disability in Wiltshire and the numbers of these aged over 50 is estimated to be approximately 480+, more of who are likely in the future to live into older



age. There are currently 108 people over 65 with a learning disability receiving services from WCC (Source: RAP 2007)

- Limiting Long-Term Illness - A smaller proportion of older people in Wiltshire have a long-term limiting illness than the national average. In terms of the individual community areas, there are no major deviations.



## Existing Accommodation - Summary

### Care Home Sector

- 3,408 care home places for older people (59% residential / 41% nursing)
- Dementia care represents 32.5% of overall provision
- Stable market
- Generally good spread throughout the county
- Unrealistic to expect local supply in each community area due to larger home provision
- Investment required in preventative / diversion services to reduce demand in future

### ***Sheltered Housing***

- 4,046 units of accommodation (69.8% rent / 30.2% sale)
- Space standards, accessibility and level of preventative services do not provide the standard of service that we would like to deliver
- Tenure and level of supply varies across county
- Under supply of leasehold and shared ownership
- Growing demand for 2 bedroom accommodation and wider tenure choice representative of general needs housing

### ***Extra Care***

- 305 units of accommodation (35% affordable housing / 65% leasehold or market rent)
- Very uneven supply across the county for all tenure types
- Significant under supply of extra care housing against all measures within Wiltshire
- Unless addressed it will impact upon Wiltshire's ability to meet future demand and older people's expectations

### ***WOPAS concludes that In Wiltshire there is:***

- An adequate supply of care home provision but a shortage of dementia and nursing home provision, especially when considering future trends and demographic projections
- A requirement to ensure that the supply of care homes remain fit for purpose and undergo a programme of modernisation to ensure future needs and requirements are able to be met.
- A shortage of private retirement housing and a tenure imbalance between the percentage of home ownership in general needs housing and in retirement housing
- A shortage of extra care housing across all tenures
- Considerable potential to develop the supported housing market further to divert more people away from residential care through a number of mechanisms, of which the further development of extra care is one. They are:
  - An enhanced extra care programme, using a range of models across all tenures
  - Reduced move on from sheltered housing into residential care
  - Diversion of self-funders from residential care into supported housing options across all tenures
  - Further development of community based services such as Telecare
- A need to accelerate the scheme decommissioning and investment process. This must include internal re-evaluation by providers of investment priorities; creative alternatives for use of redundant sheltered schemes; use of ownership models to provide private investment
- A private retirement housing market that is not operating in the best interests of the county. Older people with their future care and health costs are being imported from other areas when they buy into new private sheltered housing

schemes, and housing with care models demanded by older people are not being provided.

### **Care and Support Services - Summary**

WOPAS also looks at non accommodation services and concludes that there is clear evidence that Wiltshire is investing in and developing a wider range of preventative services and that ongoing priority should be given to:

- Further investment in key preventative areas to avoid hospital and residential care admissions
- Additional investment in informal carers to enable them to continue to care if they wish to do so
- Improved information about options and services available which is both accurate and accessible as information is fundamental to empower individuals. A service directory is required
- Further development of assistive technology services - for example, could replace some domiciliary care visits
- Further development of step down and intermediate care/hospital discharge services in conjunction with the PCT which could avoid hospital and residential care admissions
- More effective use and better co-ordination of Supporting People resources
- Significant investment to create additional capacity for independent brokerage with a consequential knock-on effect to Care Management

Based on the findings summarised above, WOPAS identifies a number of opportunities for Wiltshire County Council to reconfigure its accommodation for older people to take into account changing market conditions, trends and population and need projections. These include:

- An opportunity to encourage and diversify providers - Identify which providers (not necessarily just those currently operating in Wiltshire) are interested in considering the development of mixed tenure housing with care projects in partnership with Wiltshire authorities
- A need to review existing care and support services - effective development of services will enhance the popularity of existing sheltered schemes and reduce the early moves to residential and nursing care
- An opportunity to encourage development of shared ownership provision for older people. Evidence indicates that there is a market for this form of provision, and private investment will offer more options to providers in their development and investment plans
- Some evidence to suggest that a move to expand extra care housing has resulted in an increase in demand for nursing beds as people bypass the need for residential care and move directly to nursing care. One possible solution to this may be to increase levels of community nursing support

- The development of One Council for Wiltshire which will provide the council with the opportunity to manage the total supply of specialist older people's social housing, responding to the market in a strategic way for the first time. Demonstrating strategic management will provide confidence for external funders such as the Housing Corporation and Department of Health to invest in the county

The findings and conclusions of **WOPAS** align closely with the self assessment guidance issued by the Department of Health in 2009 (Putting People First, Use of Resources in Adult Social Care), in that “..... Local authorities continue to be faced with the challenges of making best use of resources and evidencing value for money at every opportunity. Efficiency and effectiveness in service outcomes should work hand-in-hand.”

The Department of Health recognises that future focus will need to be on Quality, Innovation, Productivity and Prevention (QUIPP) in both health and social care. QUIPP will be central to the development of best practice and how local authorities that use resources effectively, by encouraging local authorities to:

- develop lean processes for the assessment of people's needs and access to services;
- develop preventative measures that can defer or delay people needing longer-term services (the biggest single savings can be made from reducing use of residential care and creating better community-based services delivering better outcomes);
- develop more cost-effective interventions that achieve better outcomes at lower costs; and
- assist people to construct their own packages of care through personal budgets and to help them procure these services in the most cost-effective way.

### **Helping People to Remain at Home Programme**

In response to the recommendations identified in the Older People's Accommodation Strategy, the Council has embarked on an innovative and extensive programme to help people to remain in their own homes. The services included within this review are domiciliary care, housing related support, out of hours services, equipment and telecare and live in care.

The vision for this programme includes:

- Enrich people's lives: The Council will make it easier for people to access the help and support they require to enable them to remain in their own homes with the lifestyle they want
- Deliver what people want: The Council will work with other organisations to help people achieve what they want, and by doing so will help people gain control of their lives
- Provide greater choice: The Council will ensure that people have choice in where and how they can get what they need and do what they want

- Enable empowerment: The Council will promote an approach from our partners that treats people as equals
- Improve our collaboration with partners: Working with partners such as the PCT to deliver a “joined up” service to our customers that meet their needs
- Improve efficiency: The Council will work with other organisations to ensure services are provided in a cost effective and accessible manner and will continually monitor these services to ensure quality standards are maintained.

This will ensure that all people are assisted to remain at home where possible and the review will incorporate all types of services required to enhance quality of life, promote independence and reduce social isolation whilst ensuring that their care needs are met in the most appropriate manner.

The goals of the helping people to remain at home programme include:

- Better outcomes for people through the commissioning of generic services able to meet a wide range of customer’s needs
- Efficiency savings from rationalisation of services and reduction in travel times and overheads
- An increase in early intervention and preventative services to decrease the number of people needing acute care
- Better access to the right information.

This will be achieved through the implementation of a number of elements. The Council will re-commission care and support services through an independent living service tender, which will improve the quality of support by working with the best, most forward thinking providers strategically in delivering an outcome focused person centred service and to deliver savings through improved economies of scales achieved through a rationalisation in the number of providers.

Through these new contracts for care and support the Council will also commission a range of preventative services, which are imperative for long term sustainability due to demographic growth.

## **The Case for Intervention**

The case for a structured and decisive intervention in Wiltshire's older people's housing system is beyond doubt. As the demographic changes outlined begin to occur and the current, in some cases outdated and expensive to operate facilities require more and more investment, innovative responses are needed which give the opportunity for people's needs to be met in ways that meet the standards that we expect in the 21<sup>st</sup> century. People have a right to live in modern, affordable, fit for purpose homes where changing needs can be met from within their own communities.

Continued investment into existing facilities which are not fit for purpose and cannot be made fit for purpose is an ineffective use of increasingly scarce resources both in terms of capital and revenue funding. The new facilities that are proposed through this strategy will be "state of the art", efficient and cost effective to run and manage over their whole lifecycle but more importantly, will be responding to local needs in local communities. These facilities will be available to people who are able to fund their own care and those that are funded by the Council. Furthermore, these new "state of the art" facilities will be attractive to current home owners to provide a real alternative to existing family accommodation.

Based on the demographic projections referred to above, and on continuing the current patterns of providing care, the Council is forecast to spend approximately £3.3bn over the next 25 years which is an unsustainable and unmanageable resource demand. The development of new ways of delivering services through new facilities will result in reduced expenditure over the current forecast and further detailed financial forecasts of the revenue implications have been modelled. This depicts that by undertaking the proposed development plan and service remodelling, the Council would realise a cost avoidance of approximately £600m over the next 25 years. This cost avoidance will help to offset the challenges of the forecast demographic change around older people and is achieved through a diversion of people from residential care to community support or specialist nursing or dementia care, which achieves an on average saving per person of £44 per week.

The capital cost of the proposed development programme, including extra care, nursing and specialist dementia facilities, is approximately £220m based on current prices.

Responding to the agenda set out above is however challenging and complex. It involves many stakeholders, most important of who are the service users whose needs and wishes must always remain centre of the agenda. There are also many partner organisations, some providing local employment and other important services whose views will be very important as will the numerous other interested parties. Views on the proposals are likely to be diverse and therefore pro active stakeholder management will be an important element in ensuring the ultimate success of the programme.

What does present itself however is an unprecedented opportunity for Wiltshire Council to undertake a programme to modernise the way that older people's



accommodation is provided, to develop and adopt an integrated accommodation system and to ensure best use of increasingly scarce resources.

Achieving the strategic outcomes identified requires an innovative approach to be adopted by the Council and our partners. The Council will need to use assets and resources in ways that are not restricted by “ownership” or by the traditional silo operating methods and will need to work with partners in new ways, working to secure ongoing investment through long term arrangements and mutual understanding of each others businesses.

In devising this development strategy, an overview of the existing asset base for the provision of older people’s accommodation in terms of type, fit for purpose and location has been carried out and an analysis of the opportunities that the assets provide to meet the established needs in the short, medium and longer terms has been undertaken.

This has resulted in is a pragmatic development strategy, designed to meet the future needs of all older people in Wiltshire through achieving the Strategic Outcomes outlined earlier.

### **Forecasting Future Accommodation Requirements**

To support the underpinning strategy Peter Fletcher Associates produced a strategic modelling tool (The Divert Model) which allows commissioners to model the future accommodation and support needs of older people up to 2026.

The needs analysis (Divert) model developed as part of the WOPAS projected that there would be a need for 900 units of additional “mixed tenure” extra care accommodation, whereby properties are available for rent, low cost home ownership and outright sale, in the following communities over the period of the strategy:

<b>Community Area</b>	<b>Extra Care</b>	<b>Community Area</b>	<b>Extra Care</b>
Amesbury	51	Pewsey	23
Bradford on Avon	42	Salisbury	89
Calne	37	Tidworth	15
Chippenham	69	Tisbury	19
Corsham	39	Trowbridge	88
Devizes	66	Warminster	53
Downton	41	Westbury	37
Malmesbury	37	Wilton	26
Marlborough	47	Wootton Bassett	57
Melksham	50		
Mere	14	<b>Wiltshire Total</b>	<b>900</b>

However, the most recent population projections indicate that the older population will increase at a higher rate than originally anticipated. These projections indicate that the over 65 population will increase by 26% higher than the anticipated growth

rate within the Accommodation Strategy for Older People. Therefore the number of extra care units required within Wiltshire would be increased as represented in the table below.

Community Area	Extra Care	Community Area	Extra Care
Amesbury	64	Pewsey	29
Bradford on Avon	53	Salisbury	112
Calne	47	Tidworth	19
Chippenham	87	Tisbury	24
Corsham	49	Trowbridge	111
Devizes	83	Warminster	67
Downton	52	Westbury	47
Malmesbury	47	Wilton	33
Marlborough	59	Wootton Bassett	72
Melksham	63		
Mere	18	<b>Wiltshire Total</b>	<b>1,136</b>

Development of extra care housing will be vital to enable Adult Social Services to divert older people away from general residential care, and have the resources to support a growing older population.

There is also recognition that the Council (and our partners) Sheltered Housing stock is also an important element of the older people's housing system but that some of the stock is not in the right location or does not provide the accommodation type that is in most demand, and is consequently difficult to let.

There is therefore a need for a further review of the existing Sheltered Housing Stock throughout the County to understand more fully its role in the new accommodation system. This review has now commenced and should be completed by the end of March 2011.

One of the initiatives which existing sheltered housing may be suitable for is Community Extra Care (CEC), which is sometimes also known as virtual extra care. CEC means that people in communities around an extra care scheme can benefit from some of the provision whilst living in the wider community through in-reach and out-reach services. These can include personal care, housing support, meals provision, social and leisure activities and clinical appointments and is often underpinned by the use of Telecare technologies. There are currently two CEC facilities planned within the development strategy.

Improvements in accommodation and support services needs for people with specialist needs such as dementia, mental health and physical and sensory impairment is also highlighted as a current and ongoing need which requires further development.

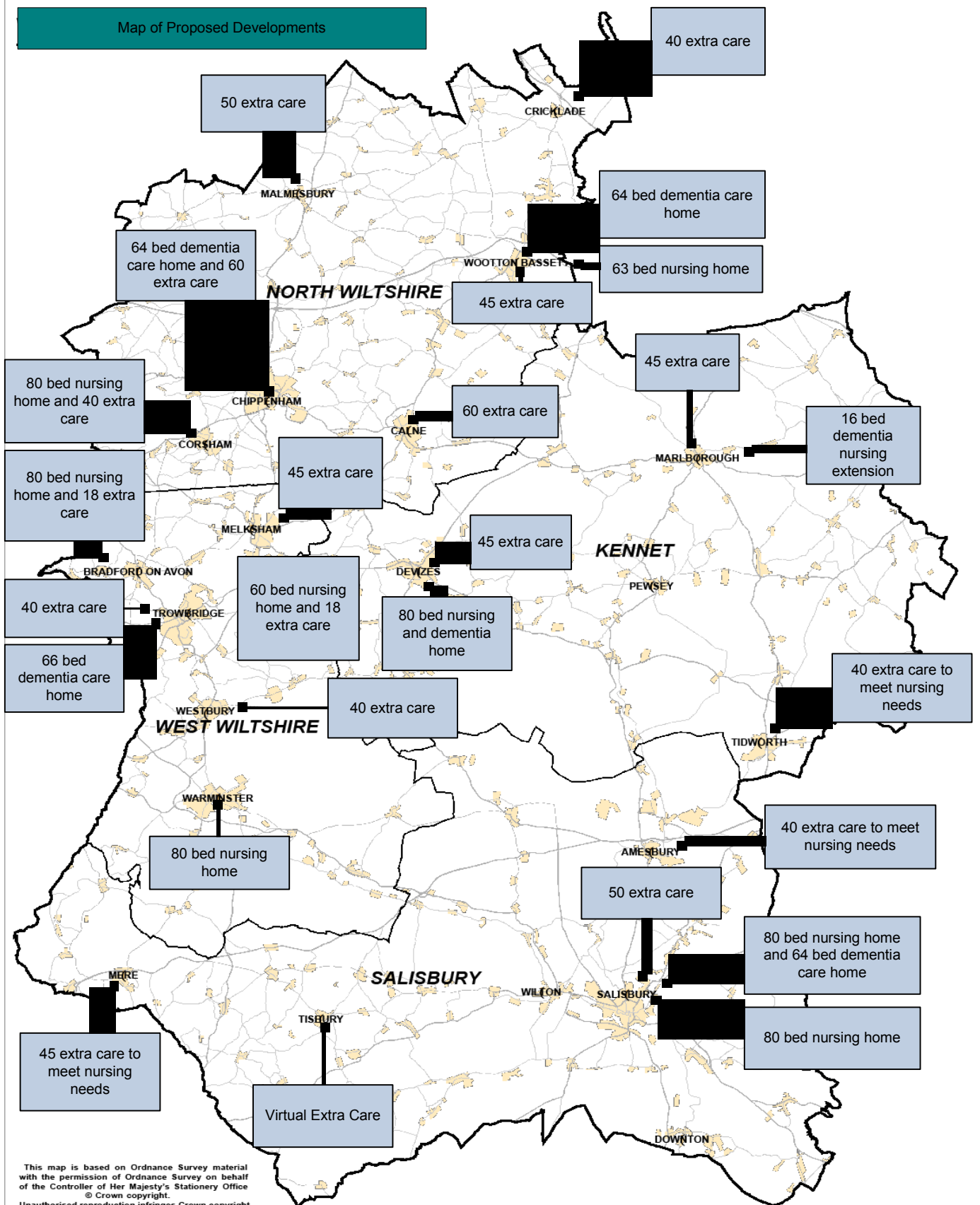
## Delivering the Strategy

Delivering 1,136 units of Extra Care Accommodation will not be achieved by the Council alone and is a long term project that requires detailed planning and

management. This Development Strategy sets out the route map to delivery. It is deliberately dynamic in nature, very likely to change due to the length of this proposed development strategy. It will also need to be able to adapt to changing market conditions and revised government policies.

This section of the strategy details the new facilities that will be provided in each community as well as showing the phases for each development. The proposed developments are illustrated in the following map.

# Map of Proposed Developments



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 Wiltshire County Council 100023455 (2007).

## Development Timeline

The strategy references two timelines which are based on current perceived deliverability and prioritisation of issues to be addressed. Option 1 is based on the assumption that the Department of Health (DH) PFI project proceeds which should be known at the end of January 2011 following a review of all live schemes by the Department of Health as a result of Comprehensive Spending Review. For pragmatic reasons, Option 2 is based on the scenario that the PFI project does not proceed. Whilst it is also acknowledged that the proposed development strategy may change over time in terms of partners, sites or timeframes, the Council's intentions for the new facilities within each of the areas will not. The timelines give detailed development plans for the period up until 2015 plus the PFI schemes. The programme is not as detailed for the following periods due to the constraints outlined but the outcomes that the strategy is seeking to deliver remain consistent.

Projects currently time-lined to proceed in the first three years of the strategy address particularly urgent needs in terms of stresses on the system, accommodation that is not fit-for-purpose or outdated and funding is or is expected to be in place in the very near future. They are deliverable with a degree of certainty and should be completed by 2013. The priority community areas for the early stages of the strategy are Wootton Bassett, Calne and Trowbridge.

The projects currently in years 3 to 5 are equally important in terms of meeting need but have a degree of dependency upon successful implementation of earlier projects or further proposals are required to ensure financial viability.

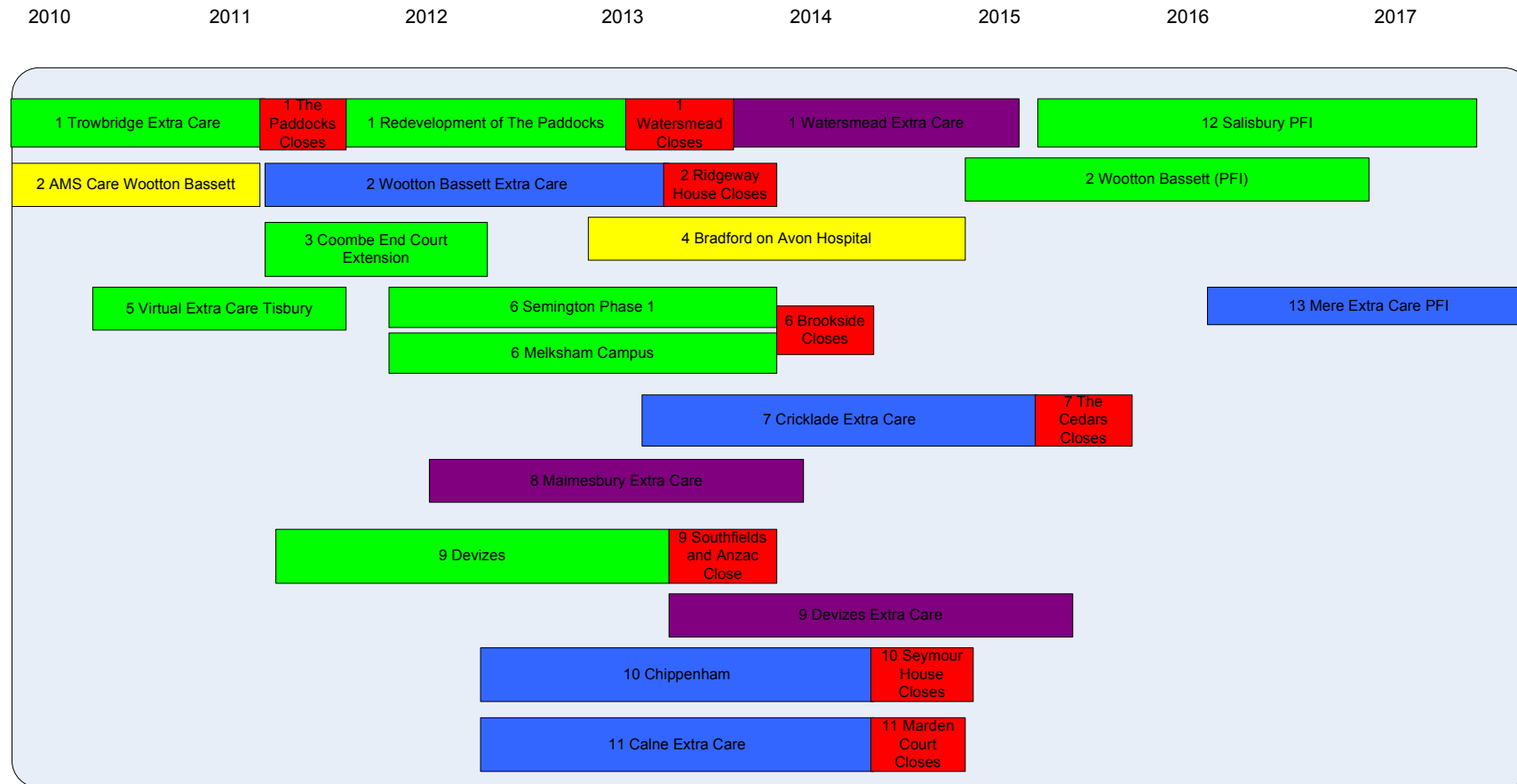
The remainder of the projects also meet known needs but the proposals require further development or joint working with other Local Authorities or bodies to be successfully delivered.

Although the projects to be delivered in both timelines are the same, the phasing is different. This is due to the facilities that, in Option 2, would not be delivered through the PFI scheme and will need to be funded and delivered through alternative methods which affect deliverability. Although some facilities may therefore be delayed, there are other, not fit-for-purpose or outdated facilities which could be replaced earlier.

The strategy demonstrates the many complex interdependencies in terms of, for example, realisation of capital receipts (for reinvestment) from land sales that are based on the ability to free sites up from existing use. These exercises can be time consuming and sometimes controversial which may affect the phasing of the various strands of the strategy, but families and service users will need to be consulted in the process.

The detail behind each timeline is provided below and it is important to note that the proposed programme ensures that new facilities will be available in appropriate community areas, prior to any closures being implemented.

## Older People Development Strategy Timeline – Option 1 PFI Proceeding



### Assumptions:

- April or October start and completion dates each year
- AMS opens but not used in additional capacity
- Land in Chippenham secured
- Corsham Care Village not progressed

### Colour Key:

- Green – land and / or funding available
- Blue – land and / or funding to be secured
- Purple – extra care land package proposal
- Yellow – private sector development
- Red – facility to be closed



## **OPTION 1 – PFI Proceeding**

### **1. Trowbridge / Westbury**

The Council in partnership with Bedfordshire Pilgrim Housing Association and the Orders of St John Care Trust (OSJCT) are building a 40 unit extra care scheme on the former Rutland House site in Trowbridge. This facility will be completed in April 2011, enabling the residents of The Paddocks care home in Trowbridge to be relocated as an interim measure to the extra care facility. The Paddocks care home will be closed as a result.

Cabinet approval has been obtained to redevelop The Paddocks care home site to provide a 66 unit specialist dementia facility which will be completed by April 2013. At this time, the residents who transferred to the extra care facility will be given the opportunity to move back to the new care home if they wish.

It is anticipated that the newly developed Paddocks site and the extra care facility will provide sufficient capacity for the existing residents of the Watersmead care home in Westbury to be relocated as an interim measure whilst the site is redeveloped. The Watersmead site will become a 40 unit extra care scheme delivered through the joint development framework agreement with Devon County Council. The development is anticipated to be completed by April 2015.

### **2. Wootton Bassett**

Castle Oak is building a new 63 bed nursing home on the former St Ivel site in Wootton Bassett. This facility will be operated by AMS Care and will be completed in January 2011.

DCS will therefore prioritise its allocation of social housing grant for financial year 2011/12 to the Housing 21 extra care development also on the former St Ivel site which will provide 45 units of accommodation. It is anticipated that this scheme will be completed in April 2013, whereby the existing residents of Ridgeway House will be relocated to it. This would enable Ridgeway House to be closed as it is the Council's preferred scheme for the Wootton Bassett element of the Department of Health PFI scheme.

The Ridgeway House site will then be redeveloped into a 64 bed specialist care home for people with dementia. Due to this development forming part of the PFI scheme, construction will not be complete until October 2016.

### **3. Marlborough (Care Home)**

Delegated authority has previously been obtained to construct a 16 bed extension to the Coombe End Court care home in Marlborough to provide nursing care for people with dementia. The timetable for completion is part of the ongoing contract negotiation discussions with OSJCT and it is the Council's aim for this development to be completed in 2012.

#### **4. Bradford on Avon**

Ridgeway Community Housing Association is in discussions regarding the potential redevelopment of the former hospital site in Bradford on Avon to provide an 80 bed nursing home and 18 units of extra care. This would be a private development and therefore the Council has no direct involvement except potentially purchasing placements in the new facilities and supporting a request for Social Housing Grant. Subject to the satisfactory completion of ongoing discussions, this development could be completed by October 2014.

#### **5. Tisbury**

The Council intends to transform the current sheltered housing scheme at Nadders Close in Tisbury into a virtual or community extra care scheme (explanation provided on page 14 above). This will form part of the sheltered housing review which is currently being undertaken. It is anticipated that the proposal for remodelling this scheme will be completed by April 2011.

#### **6. Semington / Melksham**

OSJCT, in partnership with Bedfordshire Pilgrims Housing Association, has secured planning permission to build the first phase of a care village development in Semington. This will provide a 60 bed nursing home and 18 units of extra care. It is anticipated that the first phase development will be completed by October 2013.

The Workplace Transformation Programme is currently consulting on a service campus within Melksham. A 45 unit extra care scheme could form part of the service campus should a suitable site be available / identified. Subject to the outcome of the consultation and subsequent project planning, it is anticipated that this development would be completed during 2013.

The completion of these two schemes would enable the residents of Brookside care home to be relocated. The Brookside care home would be closed as a result and the site would either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

There is an opportunity for additional extra care housing pending further planning approval being obtained.

#### **7. Cricklade / Purton**

The Council is in discussions with Westlea Housing Association regarding the potential development of a 40 unit extra care scheme in Cricklade. Subject to a suitable site being identified and funding being available, it is anticipated that the new scheme could be completed by April 2015.

The developments in Cricklade and Wootton Bassett would result in insufficient demand to justify the current facilities in Purton. Therefore, the Cedars care home in Purton will be closed and the residents relocated to either Wootton Bassett or

Cricklade. The Cedars site would either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

## **8. Malmesbury**

The Burnham House site is currently vacant due to the completion of the Athelstan House nursing home in 2008. The Burnham House site will be developed to provide a 50 unit extra care scheme as part of the joint development framework agreement. It is anticipated that construction on this site will commence in April 2012 and be completed by October 2013. These proposals have been developed through engagement with a community working group, under the Area Board.

## **9. Devizes**

OSJCT has purchased a site in Horton Avenue, Devizes to construct an 80 bed nursing and care home for people with dementia. The facility will be completed in April 2013.

The residents of Anzac House and Southfields care homes will be relocated to the new facility on Horton Avenue resulting in the closure of the two existing facilities.

One of the former sites will be redeveloped to provide a 45 unit extra care scheme as part of the joint development framework agreement. It is anticipated that this facility will be completed in April 2015. The other vacant site will either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

## **10. Chippenham**

DCS is currently in discussions with colleagues from property services and planning to secure a viable site for the development of a 64 bed specialist care home for people with dementia and 60 units of extra care. The preferred location is the current Seymour House care home site that would be supplemented with a proportion of the adjacent parkland and Meadow Lodge respite unit. It is anticipated that the care home element could be completed by April 2014 if satisfactory agreement can be reached over land usage by April 2011.

Future requirements for respite for people with a learning disability will be the subject of a separate Cabinet report which will take into account the potential loss of this site and other existing facilities within the community areas.

In the event that the Seymour House site is not viable, a development in Chippenham would not currently be possible until 2015 at the earliest due to land availability. Property services are negotiating option agreements in respect of the Council's landholdings in the Chippenham South and Chippenham East sectors both of which have been identified as possible locations for the town's proposed expansion. The option agreements would allow the Council to develop around 10 acres for its own purposes, including an adult social care scheme.

A planning application has also been submitted to provide 75 extra care units and a 61 bed care home on the Chippenham Golf Club site, which would be operated by the private sector. This application is due to be determined by the end of November 2010.

## **11. Calne**

Westlea Housing Association has indicated there is a possibility that land at the Curzon Park site in Calne could be used for an extra care scheme. Currently the scheme does not meet planning policy and has a number of site constraints to overcome. Westlea is keen to assist bringing this site forward but has concerns due to the lack of social housing grant funding and the current economic climate. DCS would prioritise this scheme for SHG allocation in 2012/13, which if available could enable this development to be completed in April 2014.

The residents of Marden Court care home would relocate to the new facility at which point the site would be sold. Marden Court adjoins a property owned by Westlea and therefore the value would contribute towards the cost of the Curzon Park scheme.

It is important to note that OSJCT have indicated that the home is currently unviable due to maintenance and financial viability concerns. This may result in OSJCT serving the Council with notice to close the home in advance of this redevelopment timeframe. Contingency plans in the event of this occurring are in the process of being developed.

## **12. Salisbury**

OSJCT has exchanged contracts for a site at Old Sarum owned by Persimmon Homes conditional upon the grant of planning consent for a care home. DCS has obtained Cabinet approval to negotiate a land swap between The Paddocks care home in Trowbridge and OSJCT's Old Sarum site for use within the Department of Health PFI programme. Subject to obtaining planning permission, the Council, through the appointed PFI contractor, would construct an 80 bed nursing home and 64 bed specialist care home for people with dementia on the Old Sarum site, which is due to be completed in April 2017.

The residents from two of the existing Salisbury care homes would be relocated to the new development, at which point the sites would be redeveloped to provide extra care and nursing home facilities.

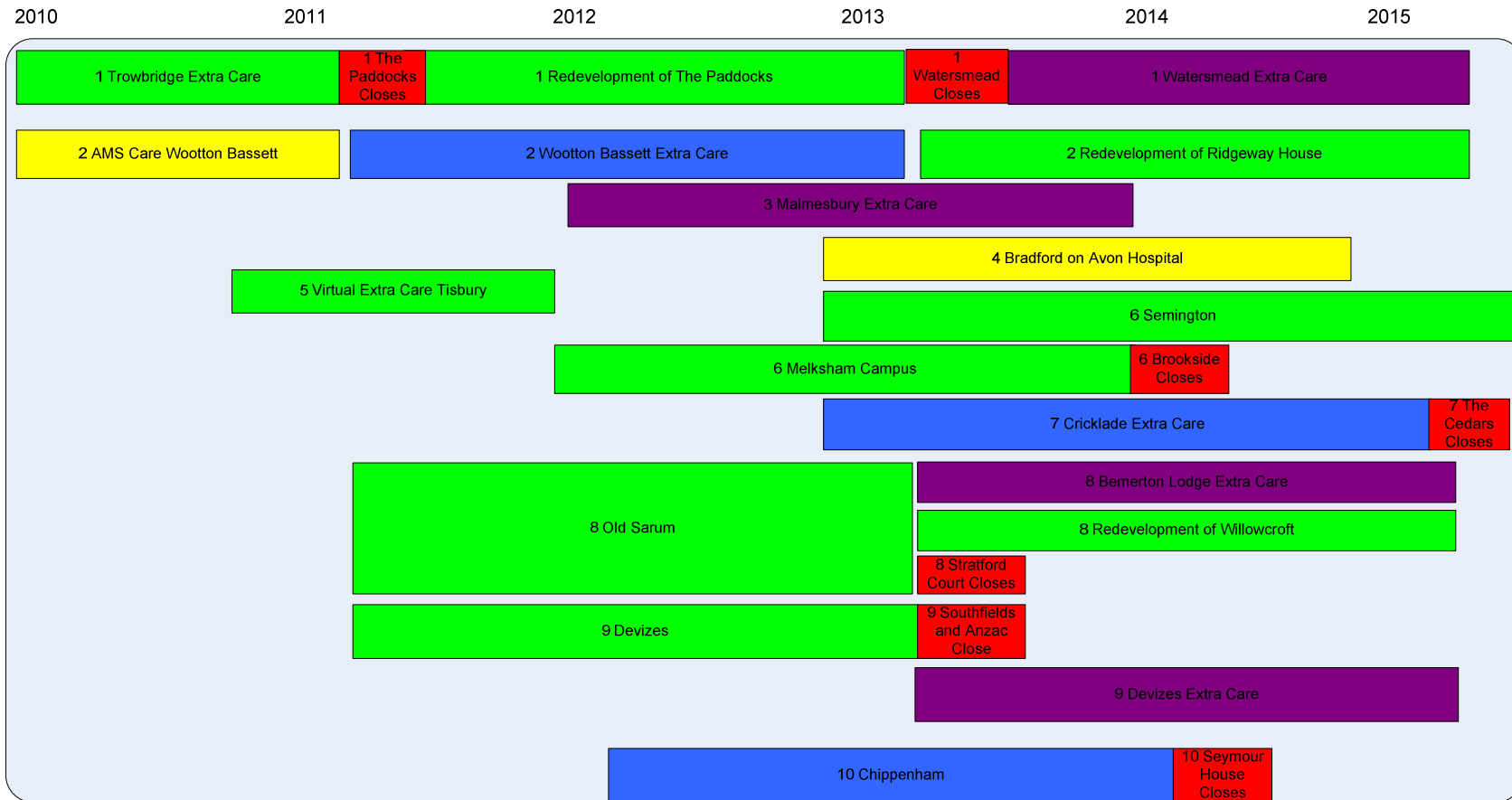
Discussions are ongoing with NHS Wiltshire regarding the possible use of part of the vacant Fountains Way site for social care purposes, which may change some of the proposals outlined above.

## **13. Mere**

The Council have submitted a proposal to the Department of Health to increase its PFI programme to enable a 45 unit extra care scheme to be built in Mere. This would be a cross-border initiative in partnership with either Somerset or Dorset

County Council. If the proposal is accepted, it is anticipated that the new facility will be completed in October 2017. This would enable the residents of Fives Court care home to be relocated to the new facility at which point the existing home would close.

## Older People Development Strategy Timeline – Option 2 PFI Not Proceeding



### Assumptions:

- April or October start and completion dates each year
- AMS opens but not used in additional capacity
- Land in Chippenham secured
- Corsham Care Village not progressed

### Colour Key:

- Green – land and / or funding available
- Blue – land and / or funding to be secured
- Purple – extra care land package proposal
- Yellow – private sector development
- Red – facility to be closed

## **OPTION 2 – PFI Not Proceeding**

### **1. Trowbridge / Westbury**

The Council in partnership with Bedfordshire Pilgrim Housing Association and the Orders of St John Care Trust (OSJCT) are building a 40 unit extra care scheme on the former Rutland House site in Trowbridge. This facility will be completed in April 2011, enabling the residents of The Paddocks care home in Trowbridge to be relocated as an interim measure to the extra care facility. The Paddocks care home will be closed as a result.

Cabinet approval has been obtained to redevelop The Paddocks care home site to provide a 66 unit specialist dementia facility which will be completed by April 2013. At this time, the residents who transferred to the extra care facility will be given the opportunity to move back to the new care home if they wish.

It is anticipated that the newly developed Paddocks site and the extra care facility will provide sufficient capacity for the existing residents of the Watersmead care home in Westbury to be relocated as an interim measure whilst the site is redeveloped. The Watersmead site will become a 40 unit extra care scheme delivered through the joint development framework agreement with Devon County Council. The development is anticipated to be completed by April 2015.

### **2. Wootton Bassett**

Castle Oak is building a new 63 bed nursing home on the former St Ivel site in Wootton Bassett. This facility will be operated by AMS Care and will be completed in January 2011.

DCS will therefore prioritise its allocation of social housing grant for financial year 2011/12 to the Housing 21 extra care development also on the former St Ivel site which will provide 45 units of accommodation. It is anticipated that this scheme will be completed in April 2013, whereby the existing residents of Ridgeway House will be relocated to it. This would enable Ridgeway House to be closed and the site redeveloped to provide a 64 bed specialist care home for people with dementia. It is anticipated that as this developed would no longer be dictated by the procurement timetable of the Department of Health PFI initiative, construction could be completed earlier in April 2015 instead of October 2016.

### **3. Malmesbury**

The Burnham House site is currently vacant due to the completion of the Athelstan House nursing home in 2008. The Burnham House site will be developed to provide a 50 unit extra care scheme as part of the joint development framework agreement. It is anticipated that construction on this site will commence in April 2012 and be completed by October 2013. These proposals have been developed through engagement with a community working group, under the Area Board.



#### **4. Bradford on Avon**

Ridgeway Community Housing Association is in discussions regarding the potential redevelopment of the former hospital site in Bradford on Avon to provide an 80 bed nursing home and 18 units of extra care. This would be a private development and therefore the Council has no direct involvement except potentially purchasing placements in the new facilities and supporting a request for Social Housing Grant. Subject to the satisfactory completion of ongoing discussions, this development could be completed by October 2014.

#### **5. Tisbury**

The Council intends to transform the current sheltered housing scheme at Nadders Close in Tisbury into a virtual or community extra care scheme (explanation provided on page 14 above). This will form part of the sheltered housing review which is currently being undertaken. It is anticipated that the proposal for remodelling this scheme will be completed by April 2011.

#### **6. Semington / Melksham**

The Workplace Transformation Programme is currently consulting on a service campus within Melksham. A 45 unit extra care scheme could form part of the service campus should a suitable site be available / identified. Subject to the outcome of the consultation and subsequent project planning, it is anticipated that this development would be completed during 2013.

The residents of Brookside care home would be relocated to this new facility and the care home would be closed as a result and the site would either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

OSJCT, in partnership with Bedfordshire Pilgrims Housing Association, has secured planning permission to build a care village development in Semington. This will provide a 60 bed nursing home and 18 units of extra care. There is an opportunity for additional extra care housing pending further planning approval being obtained. The care village would be completed in April 2016.

#### **7. Cricklade / Purton**

The Council is in discussions with Westlea Housing Association regarding the potential development of a 40 unit extra care scheme in Cricklade. Subject to a suitable site being identified and funding being available, it is anticipated that the new scheme could be completed by April 2015.

The developments in Cricklade and Wootton Bassett would result in insufficient demand to justify the current facilities in Purton. Therefore, the Cedars care home in Purton will be closed and the residents relocated to either Wootton Bassett or Cricklade. The Cedars site would either be included within the preferred developer

framework agreement or the capital receipt would be ring-fenced to fund the development programme.

## **8. Salisbury**

Due to the Council not requiring the Old Sarum site for the Department of Health PFI scheme, OSJCT would prioritise their capital resources to develop this site themselves. Subject to obtaining planning permission, OSJCT would construct a 120 bed nursing and specialist care home for people with dementia, which would enable them to relocate all of the existing residents from Stratford Court, Bemerton Lodge and Willowcroft to the new facility. It is anticipated that this would occur in April 2013.

The Bemerton Lodge site would be redeveloped to provide a 50 unit extra care facility as part of the joint development framework agreement. The Willowcroft site would be redeveloped to provide an 80 bed nursing home. Both developments would be completed by April 2015.

The residents of Stratford Court care home would be relocated to the new facilities on the Willowcroft and Bemerton Lodge sites. The Stratford Court site would either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

Discussions are ongoing with NHS Wiltshire regarding the possible use of part of the vacant Fountains Way site for social care purposes, which may change some of the proposals outlined above.

## **9. Devizes**

OSJCT has purchased a site in Horton Avenue, Devizes to construct an 80 bed nursing and care home for people with dementia. The facility will be completed in April 2013.

The residents of Anzac House and Southfields care homes will be relocated to the new facility on Horton Avenue resulting in the closure of the two existing facilities.

One of the former sites will be redeveloped to provide a 45 unit extra care scheme as part of the joint development framework agreement. It is anticipated that this facility will be completed in April 2015. The other vacant site will either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

## **10. Chippenham**

DCS is currently in discussions with colleagues from property services and planning to secure a viable site for the development of a 64 bed specialist care home for people with dementia and 60 units of extra care. The preferred location is the current Seymour House care home site that would be supplemented with a proportion of the adjacent parkland and Meadow Lodge respite unit. It is anticipated

that the care home element could be completed by April 2014 if satisfactory agreement can be reached over land usage by April 2011.

Future requirements for respite for people with a learning disability will be the subject of a separate Cabinet report which will take into account the potential loss of this site and other existing facilities within the community areas.

In the event that the Seymour House site is not viable, a development in Chippenham would not currently be possible until 2015 at the earliest due to land availability. Property services are negotiating option agreements in respect of the Council's landholdings in the Chippenham South and Chippenham East sectors both of which have been identified as possible locations for the town's proposed expansion. The option agreements would allow the Council to develop around 10 acres for its own purposes, including an adult social care scheme.

A planning application has also been submitted to provide 75 extra care units and a 61 bed care home on the Chippenham Golf Club site, which would be operated by a private provider. This application is due to be determined by the end of November 2010.

### **Development Intentions for 2015-2020**

Due to the extended nature of this development strategy proposals between 2015 and 2020 whilst meeting known needs and being strategically important, require further development in order to be successfully delivered and therefore may change as a result.

### **Amesbury**

The Council intend to construct a 40 unit extra care scheme in Amesbury as part of the joint development framework agreement. A site is required as the current Buckland Court care home site is prone to flooding and is therefore not fit for purpose. It is anticipated that once the development is completed the residents at Buckland Court would be relocated to the new facility. The site would either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

### **Corsham**

The Council have identified a need for an 80 bed nursing home and 40 units of extra care in Corsham. Unfortunately, we have not yet identified a site for this development and will be working with colleagues from property services to do so. There is also the possibility of working with Westlea Housing Association to redevelop one or some of their existing sheltered housing sites to create these required facilities. This will be explored further within the sheltered housing review that is currently being undertaken.

The new facility would enable the existing Hungerford House care home to be closed as the residents would transfer to the purpose built facilities. The site would either

be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

### **Marlborough**

The Council is in discussions with Sarsen Housing Association to explore the possibility of developing a 45 unit extra care scheme within Marlborough. An additional site is required to facilitate this and the Council is currently considering the Marlborough Resource Centre site which is being declared as surplus to requirements. Once the extra care development is completed the tenants from one or more of the current sheltered housing schemes within Marlborough may be relocated to the new facility. This would enable the site(s) to be sold to reimburse the Council for the site.

### **Tidworth**

The Council intend to construct a 40 unit extra care scheme in Tidworth as part of the joint development framework agreement. A new site is required and the Council has commenced discussions with the MOD through its property services team to identify suitable sites. It is anticipated that the once the development is completed the residents at Bartlett House would be relocated to the new facility. The site would either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

### **Warminster**

The Council intend to build an 80 bed nursing home on a site in Warminster. Colleagues from the Council's property services team are currently working to identify suitable sites and are looking at sites within the Council's, PCT's and MOD's ownership. It is anticipated that once the new development is completed the residents from the Woodmead care home would be relocated to the new facility. The site would either be included within the preferred developer framework agreement or the capital receipt would be ring-fenced to fund the development programme.

## **Managing the Markets/Future Initiatives**

### **Orders of St John Care Trust (OSJCT) Contract**

In 2005, the Council entered into a long-term contract with OSJCT for 20 years to enable the lease and the service contract to become co-terminus. This contract recognised the need for developments and / or significant refurbishments to occur during the contract term due to the ageing nature of the facilities.

The agreement stipulates that the Council has guaranteed the purchase of a set number of bed placements within the OSJCT facilities for the contract duration. There is a break clause provision within the contract at 2015, whereby the operation of the facilities would transfer to Council or another provider who had been appointed following a competitive tender exercise.

The proposals within this strategy fundamentally change the nature of service provision and accommodation to be provided by OSJCT and other providers. Therefore, the contract will require renegotiation, which will be of benefit to both parties. OSJCT are aware of the potential impacts of the strategy on their business and negotiations are ongoing.

### **Department of Health PFI**

Wiltshire Council has been provisionally allocated £49.687m through the Department of Health Social Care Private Finance Initiative following the unique bid to tackle social exclusion across boundaries by providing innovative community services for some of our most vulnerable and excluded people.

The proposed facilities will ensure older people and mental health service users have new opportunities to actively participate in their families, workplaces and communities. In Wiltshire, the proposed facilities, which are integral elements of this strategy, include:

- An 80 bed nursing home with step-up / step-down re-ablement care in Salisbury
- A 64 bed specialist care home for people with dementia in Salisbury
- A 64 bed specialist care home for people with dementia in Wootton Bassett, where placements will be jointly commissioned with Swindon Borough Council
- Dementia cafes in Salisbury and Devizes
- Mobile services delivering information and support to people living in rural areas surrounding Salisbury, Devizes and Wootton Bassett

There is also the possibility of developing an extra care facility for people with dementia in South Wiltshire, where units may be jointly commissioned with either Somerset or Dorset County Councils. This would increase the Councils PFI credit requirement to £62.394m but it should be noted that this element is considered most at risk due to the current review following the comprehensive spending review.

Wiltshire Council is currently preparing its Outline Business Case for this initiative, which it hopes to submit to the Department of Health by 30<sup>th</sup> September 2011. This would enable work to commence on site in September 2014, following a competitive tender process, with all facilities being completed by September 2017. However, due to the current review being undertaken by the Department of Health, Councils are being urged to limit external expenditure until the outcome is known, which may delay the timescales indicated above by approximately 3 months.

### **Preferred Developer Partner Framework**

A number of sites are identified in the strategy as being appropriate for the development of extra care accommodation to respond to the growing need. These sites are located in Corsham, Devizes, Malmesbury, Mere, Salisbury and Westbury. A number of other sites will become vacant as a result of the development strategy. Currently, these sites are in Calne, Devizes, Melksham, Purton and Salisbury.

The Council will offer such sites through a Preferred Developer Partner Framework currently being procured in conjunction with Devon County Council. The successful Partner(s) will be offered the opportunity to bid against a package of all or some of the land packages, with the requirement that new Extra Care facilities are built on defined parcels of the land with the remainder available for the Partner to develop as they wish (subject to planning and other consents). The Extra care facilities will be developed on a mixed tenure basis without (or with minimal) grant funding/public subsidy. The development of the Extra Care facilities may require cross subsidisation from profit generated by the development of the other land for alternative uses as well as the private sale extra care units themselves.

A covenant would be attached to the land ensuring that the developer partner would have to put in place arrangements to ensure the operation of the facilities as extra care establishments for a minimum term of 60 years. Appropriate building standards i.e. Code level 4 of Sustainable Homes and Lifetimes Homes standards, and sustainability considerations would also have to be obtained and a further covenant would stipulate a development timeframe to establish certainty of delivery.

If required, in order to enable the cross subsidy model to work, the Council could, at the appropriate time, declare the land parcels surplus and, if necessary, dispose of the land for less than market value or a nominal sum in order to provide the “subsidy” to facilitate the development of the extra care units. These sites are currently utilised by DCS for the provision of care facilities and reports will be submitted to the Capital Assets Board on a bi-annual basis. It is acknowledged that dependent upon the value of the sites, approval from the Secretary of State may be required to be obtained.

The tender process will however require proposals to maximise value to the Council in return for the land deal and provides a genuine opportunity for forward thinking partners to come forward with innovative solutions that maximise value and outcomes for the Council with respect to this development strategy. Some of those options may include joint ventures, long term revenue returns to the Council or commitments to reinvest development profits into future schemes.

It should be reiterated however that proposals may also require some further Council led subsidy such as HCA SHG funding and whilst the availability of SHG within Wiltshire is limited (see above), if it can be used in a way that enhances the overall development programme, perhaps enabling longer term investment partnerships, this should be a matter for further deliberation. Discussions are ongoing and actively being progressed around the opportunity to secure other sources of funding such as S106 planning contributions.

It could also be the case that proposals are received which deliver the facilities needed, in the communities identified but not on the land that has been sold through this process. In other words, an organisation proposes to build the new extra care on a completely different site (but within the defined community). This type of proposal should also be welcomed provided that it meets the local identified need and provides the appropriate value for money.

## Sheltered Housing

The stock of sheltered housing in Wiltshire, (both Council and partners), is an important element of the older people's housing system. It is recognised however that some of the stock is not in the right location or does not provide the accommodation type that is in most demand, and is consequently difficult to let.

The contribution that sheltered housing has made in the past to the older peoples accommodation system is significant, however, people's needs and aspirations have changed over time, the way that services and support are provided have changed but in general, the accommodation has not changed, it may not be "fit for purpose" and is therefore not contributing to the system as it should. A key element of the development strategy is therefore ensuring that the stock is fit for purpose, meeting current and projected needs and expectations.

There is therefore a need for a further review of the existing Sheltered Housing Stock throughout the County to understand more fully its role in the new accommodation system. This will also include how to make best use of facilities to meet the needs of vulnerable people supported by Adult Social Care and the overall Council's desire to meet its financial efficiency programme. This review is underway and will be undertaken on phased basis in conjunction with our partner Registered Social Landlords (RSLs) who own and operate the sheltered housing stock in the East, North and West of the county.

The review methodology developed by Housing and Adult Care explores the options that are available for the existing sheltered housing stock within the County. The review will be carried out in two stages. Stage 1 will be a Scheme Viability Assessment Model and Stage 2, an Options Appraisal of any schemes being considered as "not viable".

The options appraisal will include:

### *Retain the existing accommodation:*

- Do nothing – continue as currently operated
- Refurbish to meet minimum standards
- Refurbish to improve internal layout and standards of accommodation with improvements to communal facilities, environment, bedsits to 1/2 bedroom units etc
- Refurbish to alternative use such as Virtual Extra Care/Extra Care

### *Redevelop sites (demolition and new build) for residential uses:*

- Social housing
- Private Housing for sale
- Mixed tenure use of social and private

### *Non housing/residential uses*

### *Mixed use development*



The options appraisal will also include an analysis of deliverability taking into account capital and revenue funding options and lifetime costs as well planning and other issues.

The schemes will then be scored against each option, again weighted if appropriate, which will result in a combined rating against viability and options (redevelopment/future use etc) which in turn will result in a clear evidence base for prioritisation of intervention/investment.

One of the initiatives which existing sheltered housing may be suitable for is Community Extra Care (CEC), which is sometimes also known as virtual extra care. CEC means that people in communities around an extra care scheme can benefit from some of the provision whilst living in the wider community through in-reach and out-reach services. These can include personal care, housing support, meals provision, social and leisure activities and clinical appointments and is often underpinned by the use of Telecare technologies.

The review and potential remodelling of the sheltered housing stock could make a significant contribution to meeting the needs of the older population more effectively, particularly where these schemes are located in the same town as a proposed extra care scheme. It will help to provide care services more effectively to the wider community and to provide facilities that the wider community could potentially access.

This model of providing a range of accommodation for older people including general needs, sheltered and extra care will provide a range of choice and enable flexibility within the care system for residents of a community as they move through old age without necessarily having to relocate in order to receive appropriate care and support to meet their needs.

The allocations process for sheltered housing and extra care accommodation is also being reviewed to ensure that the system is fully accessible for vulnerable people, is able to adequately assess the care requirements of individuals and ensures that the allocations process for these facilities is fair and transparent.

### **Private Sector Developments**

Successful implementation of the strategy will include working with private sector organisations to ensure that existing and planned facilities and developments contribute to the older people's accommodation system in a structured and managed way. New private sector development proposals may, for example, meet local needs in communities making Council led redevelopment unnecessary. Such proposals may be welcome in that respect but may also expose a potential risk in terms of future costs.

It is therefore appropriate for the Council to take steps to "manage" and influence the market, ensuring that any private sector developments or initiatives which impact on this strategy are monitored and that we work with the private sector as partners in delivering the strategy.

Ongoing actions include constant monitoring of planning applications to influence the nature of older people's accommodation that comes forward as well as working with colleagues in Planning and Housing to inform both planning decisions and development of housing policy to help deliver the principles of the strategy.

## **Financial Considerations**

### ***Development Funding***

As highlighted previously, developing more cost-effective interventions that achieve better outcomes at lower costs is one of the key challenges for the Council. This is challenging in the current economic climate as not only revenue spending needs to be reviewed but also the availability of capital funding for new developments and for reinvestment into upgrading or refurbishment is severely restricted. One of the major funding streams for extra care housing in the recent past has been Homes and Communities Agency (HCA) Social Housing Grant (SHG). SHG is currently very limited and the Council needs to consider the various calls on that funding when deciding its priorities for the HCA programme due to the outcome of the Comprehensive Spending Review.

In the absence of additional SHG funding, in order to deliver the strategy, consideration must be given to alternative funding streams and how these may be used to supplement any available SHG or to directly fund development where none is available. It is also timely to consider how the Council can work with the RSL partners and the private sector to enable and encourage capital investment.

### ***HCA Programme***

As previously stated, development proposals may also require some further Council led subsidy such as HCA Social Housing Grant. There are ongoing discussions between Adult Social care and Housing regarding priorities for any future SHG programmes that are available. Indicative calculation for HCA grant requirements to support schemes within this strategy would amount to approximately £44m, which could exceed the Council's allocation once other proposals and priorities are taken into account. Therefore, the Council is aiming to reduce this reliance on public subsidy in the provision of extra care housing through working in partnership with the private sector. Once the SHG programme has been confirmed for the forthcoming financial years, the prioritisation and allocation of funding will be determined by Members through the approval of the Local Investment Plan. Currently it is recognised that there is a case for Adult Social Care to receive 20% of the overall SHG funding allocation.

### **Other Capital Costs**

Other capital costs which may occur include the costs of providing furniture when residents are re-housed in alternative facilities. For example, for the Florence Court

extra care scheme, the Council is funding furniture up to a maximum amount of £70,000 to enable the residents of The Paddocks to re-locate in the interim pending the redevelopment of the site. Should any development proposals require additional capital costs, it will be the subject of a separate Cabinet report.

## **Revenue Funding**

There are revenue as well as capital implications in implementing the strategy due to the increase in care costs in the short-term due to transitional arrangements concerning the relocation of existing residents. This may include the cost of additional staff to enable people to be managed in an alternative environment, which are not as a direct result of an individual's care needs changing. These costs will be met from existing revenue resources.

There are also costs associated with the finalisation of this development strategy. This may include the cost of obtaining valuations for the Council owned sites, legal expenditure associated with the extra care procurement as well as costs associated with stakeholder engagement and consultation. Costs may also be incurred for specialists and project management personnel.

There will therefore be a need for an ongoing revenue budget to fund this strategy of £200,000 per annum and this will be considered as part of the budget setting process for inclusion within the department's business plan for financial year 2011/12. If accepted, the budget will be reviewed on an annual basis.

## **Affordability of Care Provision**

It will obviously be imperative that a proportion of all new developments provide value for money and affordable provision for the Council. To assist with this, the Council has commissioned a review of charges within the care market that is scheduled to be completed by mid December 2010. This will provide a benchmark to assess future prices for care against and also provide advice and information as to how the Council could manage the care market differently to ensure value for money.

## **Risks and Risk Management**

Ambitious programmes such as this involve a number of risks which in turn require careful risk management as an ongoing activity throughout the life of the programme and particularly bearing in mind the projected length of the programme and the dynamic nature of the strategy.

Some of the high level risks identified at this stage include:

- Political Support
- Closing facilities and moving residents
- Stakeholder engagement and management
- Commercially attractive proposition to market
- The project Interdependencies – Project Management

- Planning (new development and disposal of assets)
- Land availability
- Renegotiation of OSJCT contract
- HCA funding availability
- Revenue/Capital funding availability
- Capacity of Council and partners to deliver

In order to manage the risks effectively, a full risk register and risk management plan will be developed by project stakeholders. Detailed risk assessments will also be carried out for individual projects as they are commissioned.

## **Conclusion**

As previously stated the case for intervention is overwhelming as is the requirement to implement the strategy forthwith if the Council is to achieve the high level outcomes including the provision of fit-for-purpose accommodation and cost avoidance in this economically challenging period resulting from the demographic growth. The implementation and provision of newly built facilities will also promote independence, choice and well-being for the communities of Wiltshire.

**REPORT OUTLINE FOR AREA PLANNING COMMITTEES****Report No.**

<b>Date of Meeting</b>	10 <sup>th</sup> November 2022
<b>Application Number</b>	PL/2021/09778
<b>Site Address</b>	Station works site Tisbury
<b>Proposal</b>	Outline planning application for redevelopment of the Station Works site to provide a mixed development of up to 86 dwellings, a care home of up to 40 bedspaces with associated medical facilities, new pedestrian and vehicular access and traffic management works, a safeguarded area for any future rail improvements, and areas of public open space.
<b>Applicant</b>	Tisbury Homes
<b>Town/Parish Council</b>	Tisbury
<b>Electoral Division</b>	Tisbury (Cllr Errington)
<b>Grid Ref</b>	
<b>Type of application</b>	Outline planning
<b>Case Officer</b>	Richard Hughes

**Reason for the application being considered by Committee**

The application has been called-in by Cllr Errington. Notwithstanding, the applicants have formally appeal against non-determination of the application. As a result the Planning Inspectorate is the determining authority, not this Council.

**1. Purpose of Report**

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider, in light of the non determination appeal, Members need to consider whether the application would have been refused as recommended.

**2. Report Summary**

The issues in this case are:

- Principle of development, policy and planning history;
- Design, scale and impact to the amenity of the area/AONB/heritage asset impacts
- General Amenity issues
- Parking/Highways Impact, rights of way
- Impact on railway station and line
- Archaeology
- Ecological Impact
- S106 matters

**3. Site Description**

The site is located on the southern edge of Tisbury and its Conservation Area, and has historically been in industrial use, originally associated as its name suggests with the adjacent railway line and station. The site is located within the defined settlement boundary of Tisbury, and is allocated for development in the Tisbury Neighbourhood Plan. The site contains a collection of industrial buildings, with vehicular access points onto the adjacent road to the

south west. The railway line and station form the western/northern boundaries of the site. The land to the north and east of the site is elevated open land within the countryside. A footpath system lies adjacent to the north of the site and across the railway line.

#### **4. Planning History**

The planning history of the site largely relates to the industrial uses on the site, although the applications below are relevant as history:

S/2011/0660 - prior approval granted for the demolition of the office block and a warehouse on the site.

In the early 2000's two planning applications for a mixed-use development of residential and employment uses, with alterations to the site access, reference S/2002/1367 and S/2003/2547 were refused, due to the loss of employment land was unacceptable and that the site lay outside an area allocated for residential development.

#### **5. The Proposal**

The proposal is in outline, with all matters other than access reserved. The application is for up to 86 dwellings with open space on the site, and also a 40 bed care home. Access would be from the existing access points to the south west of the site off Jobbers Lane. The submitted details include:

- 2 x 1-bedroom flats
  - 10 x 2-bedroom flats
  - 42 x 2-bedroom houses
  - 29 x 3-bedroom houses
  - 3 x 4-bedroom houses
- 12 of these dwellings to be affordable housing, as follows:
  - 2 x 1-bedroom flats
  - 4 x 2-bedroom flats
  - 3 x 2-bedroom houses
  - 1 x 3-bedroom house
- A 30-40-bed care home, to possibly also include community medical facilities.
- Areas of on-site amenity space and landscaping;
- Provision of an area of approximately 0.4 hectares of land safeguarded for future improvements to Tisbury railway station, including an indicative vehicular access to this area;
- Closure of the northern arm of the existing vehicular access to vehicle traffic to improve visibility for traffic

entering and exiting the site. Using the northern arm of the existing vehicular access as a pedestrian and cycle access only, linked to a new pedestrian crossing;

- Creation of a new dedicated pedestrian and cycle route between the site and the existing Stubbles footpath on Station Road toward Church Street, including exclusive use of one bore of the existing railway bridge for pedestrians and cyclists;
- Traffic management measures including the provision of traffic signals on Station Road and Jobbers Lane to allow single lane alternate running of vehicle traffic through the right hand bore of the railway bridge.

## **6. Local Planning Policy**

National Planning Policy Framework, including the National Design Guide and Code.

Wiltshire Core Strategy

Core Policy 1 Settlement Strategy

Core Policy 2 Delivery Strategy

Core Policy 3 Infrastructure delivery

Core Policy 27 – Strategy for Tisbury

Core Policy 35 & 36 – Employment and economic regeneration

Core Policy 43 – Affordable housing provision

Core Policy 50/52 Biodiversity and Geodiversity

Core Policy 51 Landscaping

Core Policy 55 – Air Quality

Core Policy 56 - Contamination

Core Policy 57 Ensuring high quality design and place shaping

Core Policy 58 Heritage Assets

Core Policy 60, 61, 62 Transport and New Development

Core Policy 67 – Drainage

Core Policy 69 – River Avon SAC

Saved policy R2 – Open space

Saved policy D8 – Public Art

Creating Places SPD

Wiltshire Local Transport Plan 2015-2026  
and Car Parking Strategy

Wiltshire Waste Core Strategy policy WCS 6

Planning Obligations DPD

Adopted Tisbury Neighbourhood Plan, including EB1, BL1, BL2 BL3 BL7, HNA1, & HNA3  
Adopted Tisbury Conservation Area Appraisal

## **7. Summary of consultation responses**

WC Highways – Object (see highways section in report)

WC Landscape – Raise certain landscape impact details

WC Rights of Way – No objections, subject to footpaths near the site being upgraded via a financial contribution.

WC Public Protection – No objections subject to conditions

WC Ecology – No objection, provided the impact of the scheme in terms of phosphates on the River Avon SAC is mitigated

WC Drainage – Object (see flooding section)

WC Housing – Object. Scheme should provide 30 percent affordable housing.

WC Waste and recycling – No objection subject to S106 contributions

WC Education – Object as application would not provide any mitigating financial contribution towards off site educational provision.

WC Open Space - No objection subject to open space being provided on site and S106 contributions

WC Archaeology – No objection subject to a condition

WC Spatial - Concern that the proposal does not accord with the development plan

WC Economic Development – Object to loss of/lack of inclusion of industrial employment

WC Urban Design - Concerns expressed due to limited linkages and issues with the suggested design and layout

Environment Agency – Object as the access route is situated in an area known to flood(see Flooding and Drainage section)

Wessex Water – General advice. No objections, but refers to infrastructure crossing the site.

Network Rail – No objections in principle, subject to the occupiers of the proposal site should not use the adjacent footpath which runs across the railway line. Other general matters raised regards the development works not affecting the railway operation or land.

Natural England – No objection, but advice how the LPA should consider the application and the Habitats Regulations Assessment

## **8. Publicity**

Third Parties: 273 responses stating the following general matters:

- Protection of wildlife/ecology/swifts required with provision of built in features
- Scheme would have an impact on existing parking and traffic issues
- Flooding issues haven't been addressed
- Not enough facilities and services for more dwellings in Tisbury
- Need affordable housing for local people
- No need for the care home
- Overdevelopment of the site
- Will be out of keeping with the area
- No energy efficiency measures included
- Not in accordance with neighbourhood plan policies
- No proper community consultation undertaken
- Would affect the AONB
- No solution to crossing the railway line has been found or assessed

Tisbury Parish Council – Object for the following reasons (summary)



1. While we support the development of Station Works, in line with the Tisbury and West Tisbury Neighbourhood Development Plan (2019-2036), this application breaches the plan's policy BL.7 multiple times. These breaches are detailed below. It also breaches policy BL.3 on the development of brownfield sites.

2. The application itself is inadequate; it lacks important detail and breaches the NPPF as outlined in our previous comments (now repeated in appendix 1).

3. The proposed development is situated adjacent to a Level 3 Flood Zone; recent excessive flooding demonstrates our concerns over the impact of the development on the risk of future flooding events, as well as the risk of a lack of accessibility to the site and, in particular, the pedestrian access to the site. Also detailed below

West Tisbury Parish Council - West Tisbury Parish Council are grateful to be consultees on this outline planning application which will have a huge impact on the village of Tisbury and the surrounding parishes. As a neighbouring parish - and bearing in mind that most of the population of West Tisbury Parish live within the settlement boundary of the village of Tisbury - any development of the scale proposed in this planning application will affect our parishioners and our parish. As joint authors with Tisbury Parish Council of the Tisbury and West Tisbury Neighbourhood Plan<sup>1</sup> (made November 2019), we have been working closely with Tisbury Parish Council on this proposed development at Station Works.

We note that the planning application is for the principle of development of 86 dwellings and a care home of up to 40 bedspaces - with all other matters reserved except for the pedestrian and vehicular access and traffic management works.

West Tisbury Parish Council objects to the application on the grounds of:

- Scale and density
- Lack of mixed use
- Availability of affordable housing
- Pedestrian, cycle and vehicular access

West Tisbury Parish Council also consider that too many key issues are reserved, and fear for the impact on Tisbury's infrastructure without suitable contributions.

Sutton Mandeville Parish Council - We support and mirror the responses and comments of our neighbouring Tisbury, West Tisbury, Swallowcliffe and Ansty Parish Councils.

Especially concerns for Sutton Mandeville Parish Council are:

- Increased volume of traffic through the parish (via C24), which residents continually raise concerns about with SMPC and directly with Wiltshire Councillor Nabil Najjar
- knock on issues regarding access to services, schools, GP surgeries.
- limited employment opportunities arising through the development proposed.

Sutton Mandeville PC object to proposals in planning application PL/2021 09778 on behalf of residents.

Hindon PC - Hindon Parish Council would like to add its name to the list of Parish Councils objecting to this ill thought out planning application

Fonthil and Berwick St Leonard PC

Firstly, and most importantly must be the question of access. The existing access to the site floods, as evidenced on October 21st, 2021, when the height of the river rose to half a meter above its previously record high, therefore, the facts stated in the planning documents are

wrong. 90.62m is not the highest recorded but presumably this should now be over 91m. This shows that access to the site is not feasible or sustainable for a new development of this size. See photographs of the road flooded and closed for a period of 24 hours. This must suggest the flood risk assessment and advice is unreliable or out of date.

2. How would the care home and the 86 households' access or egress the site for 24 hours? And this is not an isolated incident. It has happened at least 3 times in the last 25 years, Surely, this can't be a suitable or sustainable access for 86 homes and a large care home. Paragraph 2.39 in the planning statement clearly suggests how the access is liable to flooding surely this is a relevant factor and needs to be given suitable weight in consideration of this application.

3. The report is less accurate in its reference to the neighbourhood plan, suggesting that the proposed intensive development is in line with that neighbourhood plan. The scheme is far more intensive than envisaged by the Neighbourhood plan.

4. Furthermore, there appears to be no comment that most of the access into Tisbury is through the listed Fonthill Park and ultimately through the grade 1 listed archway. Surely this deserves mention in terms of increasing the volume of traffic by, probably, up to 15% and vehicle movements by up to 45 per day. At least half of the vehicles will access Tisbury via the Fonthill arch. No consideration has been given to any effect this might have on the listed structure.

5. Access to Tisbury via Hindon is also through a single lane tunnel.

6. As a result of the proposed development and reducing the two-arch bridge to a single arch for vehicles will mean all major access points into the village will effectively be single file and the one subject to this application will also have the added restriction of traffic lights.

7. Traffic lights as proposed are totally inappropriate for the area the village and the AONB and do not respect the rural character of the location.

8. The proposed development does not take into account the current planning application (pending) for the change of use of the South Western Hotel to a Co-op store. This in turn will increase the intensity of vehicles in the area where the traffic lights are proposed which will create complete chaos in that location.

9. The improvements in the footpath and the cycle way safety could be achieved without having the excuse of an intensive development of this nature. Indeed, it would be sensible for the parish council to draw up such a plan for discussion with neighbouring stakeholders.

10. It is difficult to see how the application delivers significant highway improvement in the locality as stated in paragraph 6.23 of the planning statement. This must be a false statement as clearly there is no planned tangible improvement to the highway in the locality.

11. The transport assessment states it is not considered that the proposed development will have any material impact on the existing road network in terms of highway capacity or highway safety. This simply cannot be true given the number of properties and the size of the care home suggested, adding to an already congested system of narrow lanes with the only access to the site being one which floods. The planning statement states at 7.2 that the primary vehicle access is off Jobbers Lane: it is in fact the only vehicular access and, as previously stated, and clearly seen, it floods even though the rest of the site may not be at risk of flooding

12. The assessment of the flood risk and the statements relating thereto are misleading. The access to the site is clearly in a flood zone and there is a severe risk of flooding meaning access into the site would be impossible in times of flood therefore is not a suitable location for a care home.

13. The groundwater monitoring took place in June and September notably dry months. it should be appreciated that groundwater rises significantly in the winter in this area and so suggest the flood risk assessment is not sufficiently detailed or covers a long enough period or the highway access.

14. The summary conclusion of the risk assessment report suggested the site is deemed unacceptable for future residential use. The contamination is a known fact and so to suggest an intensive development to afford the clean-up is misguided and not the assumed position to start from. Surely to recognise the contamination and plan around it would be more suitable.

### Swallowcliffe PC

*Following an extraordinary meeting of parishioners, at which 30 were present, Swallowcliffe Parish Council (SPC) has considered the above application. Since the application is divided into two parts, the observations are also divided into two, and are set out below. Although the proposed developments are only indicative and are reserved matters, SPC has reviewed them as they are the reason why the road works on Jobbers Lane are being proposed and they are described in detail in the application and its associated supporting papers.*

*SPC has also reviewed the objections raised by the Access To Tisbury Group (ATTG) on behalf of eight parishes surrounding Tisbury, including Swallowcliffe, and fully endorses them. This response is in addition to that of ATTG and is the responsibility solely of SPC.*

#### *Detailed Consent for Improved Access to the Site*

*To enhance pedestrian and cycle access from the site into Tisbury the applicant proposes an elevated walkway through the eastern bore of the railway bridge which will require its closure to motor traffic and the installation of traffic lights to control the resultant one way flow through the remaining bore.*

*Whilst SPC are in favour of the principle of redeveloping this site, SPC objects to these access proposals on the following grounds:*

*The closure of one bore of the bridge will halve the capacity of the only distributor road to the south of Tisbury and will thus divert an unacceptable flow of northbound traffic onto the highly constricted Tisbury Row and then either The Avenue, Park, Cuff's or Duck Lanes. This will reduce access from the south to Tisbury as drivers, including farm vehicles, seek to avoid the threat of delays at the bridge and will adversely affect the well being of residents on these roads. The converse will apply to southbound traffic.*

*The proposed development will reduce accessibility of residents of the Tisbury Community Area (TCA) living to the south of the railway to Tisbury's services and shops, particularly if the Co-op moves to the South Western Pub site.*

*The installation of light controlled one way flows under the remaining bore will slow the speed of response of emergency vehicles. The Fire Brigade have commented that such an arrangement would have to be negotiated with care; it is not clear where vehicles already under the bridge or its approaches could go so as to provide sufficient room for emergency vehicles to get through.*

*The central bore remaining for vehicular traffic is subject to frequent flooding, which will only compound the problems outlined in 3 above. Local weather records indicate that the incidence of flooding has increased significantly this century with the bridge being blocked by two "one in a hundred year" floods in the past 20 years.*

*There have been two such incidents in the past month, one of which led to premises just to the north of the bridge being flooded. They also led to footpath TISB74 being under water; this is the main pedestrian link by which it is proposed pedestrians from the site access Tisbury. Significant flooding of the bore now occurs on average five times a year, causing drivers to use the eastern bore which is slightly higher.*

*The large scale of the proposals has access implications throughout most of the TCA, yet the application only considers the capacity of Jobbers Lane immediately outside the site, which is described as 5.8m wide and is felt by the applicant to be of sufficient size to cope with the motor traffic likely to be generated by the proposed development. The applicant neglects to deal with the fact that substantial portions of the lanes which connect to the A30 and A350 to the west and south are less than 3m in width, so narrow that in Swallowcliffe alone there are at least three stretches where two cars cannot pass (see example Figure 1). The same conditions exist in Ansty and on routes to the A350. Any significant increase in traffic flow would constitute a heightened danger and loss of amenity to residents of Swallowcliffe.*

*The applicant estimates the indicative development would lead to an increase of on some 40 car borne journeys at each of the peak hours. If only half of these head south toward the A30, SID data suggests this would represent a 15% increase in peak hour flow, a significant increase.*

*Insufficient account has been taken of the likely traffic generated by the care home which will include three shifts of 12 workers, visitors, truck deliveries and specialist waste removal. This would be exacerbated should there be an associated provision of medical facilities for use by local residents.*

*Indicative plans are for some 375 residents living on the site (see Section 3.11 of the applicant's planning statement). In the 2011 Census Wiltshire car ownership was 596 per 1000 population. This figure is likely to be higher now because car ownership has increased and the site is set in a rural area that does not include some of the larger towns in Wiltshire. However even on 2011 county data the indicative population will generate a demand for some 205 parking spaces. Only 191 residential spaces are being provided on site so it is highly likely that overspill parking will take place on Jobbers Lane and Station Road, further reducing capacity and also reducing the attractiveness of Tisbury as a service centre to much of the TCA, some of whose trade will be diverted to Shaftesbury and Salisbury.*

*On the basis of the submitted documents, there is no evidence that the applicant has considered the wider impact of the proposals on the TCA road network, nor alternative means of providing pedestrian access to Tisbury. For example replacing the footpath crossing to the immediate east of the station is not considered despite it being clear from the documentation that it is Network Rail's intention to effect these works for safety reasons. This is to be subject to a cost/benefit evaluation and no doubt a developer contribution would improve feasibility.*

*In the view of SPC this application should be refused and the applicant invited to reconsider its access proposals as the current proposals constitute a loss of amenity and a threat to the health of residents living on lanes to the south of the site and within Tisbury itself.*

## *Matters reserved for Subsequent Planning Applications*

*SPC is concerned that if the detailed access element of this application is granted, the maximum scale of developments reserved for future applications will, by implication, be tacitly deemed acceptable, even though they will have to be the subject of subsequent consents. Therefore, observations are made here concerning the indicative developments outlined that constitute the bulk of the current application.*

*SPC believes that both the nature and quantum of development proposed is unacceptable and in conflict with the Tisbury Neighbourhood Plan (TNP). This seeks to make provision for commercial uses having regard to the needs of the local and currently on-site businesses.*

*We understand there are currently 35 jobs and post COVID vacancies on site. Light industrial and business uses would add to the diversity of economic activity in Tisbury and provide a wider range of employment opportunities than the proposed “up to” 40 bed care home. It should be noted that Tisbury already enjoys the benefit of two such facilities in what is effectively the same use class as residential. An additional home will have to draw from a geographically wider pool of labour, thus increasing trip generation and missing the opportunity to diversify the Tisbury economy.*

*The TNP also indicates a desirable maximum of about 60 dwellings on site, of which some 30% should be affordable or social. The proposal indicates “up to” 86 dwellings of which only 14% would be affordable. This reduction is justified by the applicant’s assumption that the eventual developer will need to secure a 20% rate of return. However, according to the applicant’s own submission, there is only a 0.1% difference in returns between 14% affordable /social provision and 30%; both options showing a 23% return on cost. Given such a high return there would seem to be scope for improved access arrangements that do not involve the half closure of the railway bridge to vehicular traffic.*

*In sum, SWC’s reasons for objection to the indicative component of this application are*

*The scheme would represent overdevelopment in an AONB and is at such a scale that it would exercise a deleterious impact on the safety and amenity of Swallowcliffe residents*

*The proposal is at odds with the TNP’s aim for mixed uses on site and with an increase of up to 425 residents (estimated as around 15% of the wider Tisbury population) would seriously overload the services Tisbury provide to its TCA.*

Teffont PC - *Whilst noting that the Developers have applied for a scheme which makes the site a cul-de-sac that is isolated from Tisbury by a reduced existing railway bridge. A bridge that is presently too low for many vehicles including Fire Engines.*

*The highway through the bridge also floods after intense rainfall or a snow melt.*

*The proposed alterations to the road access will encourage vehicles to turn left out of the site and pass through Swallowcliffe or Ansty to join the A30 thus giving rise to a ghetto the other side of the railway track isolated from Tisbury.*

*Whilst it is noted that Tisbury PC supports the development of the Station Works Site in their adopted Neighbourhood Plan it is unlikely that the proposals meet the aspirations of the Tisbury citizens based on the comments included in the Neighbourhood Plan.*

*The Tisbury Neighbourhood Plan only paid lip service to the highway network serving Tisbury through the surrounding villages.*

*Teffont PC wishes to see Tisbury continue as a successful local hub, however, it is this Highways network particularly within the Parish of Teffont that concerns Teffont Parish Council.*

*There is no indication that anybody has modelled the potential traffic generation on anything other than the Railway Bridge, where the results are used to support the preposterous proposal of closing one arch and putting traffic lights on the other.*

*(Why not a new bridge under the railway linked to dredging and lowering the Nadder to reduce the risk of flooding on the access to the site and in Tisbury Row. A scheme to lower a bridge, under the railway has recently been carried out in Westbury the original estimate was £7 million. Not a large amount if the Highways Authority, British Rail and Wessex Water combine resources and ask for a sensible contribution from the site developer.)*

*If increased traffic from the site chooses to travel to and from Salisbury on the C24 it will be using a "lane" that is blatantly inadequate for the present traffic including the large lorries carrying goods to the EHD Site, Chicksgrove Quarry etc.*

*At the very least the C24 needs improvements at the junction with the B3089 (known as Stocks Corner) and additional lay bays to facilitate safe passing.*

*We have no doubts that these suggestions will be born out when the Highways Authority investigates the route and models the increased traffic generation from a fully developed Station Works Site.*

### Chilmark PC

*We support the redevelopment of the Station Works site as framed by the Tisbury Neighbourhood Plan with a balance of housing and small business / commercial units providing local employment to minimise 'out commuting'.*

*Chilmark is a rural village 2.5 miles from Tisbury. A country road, Becketts Lane, leads from Chilmark and Ridge to Tisbury, defined by Wiltshire Council as a Local Service Centre, providing Chilmark and surrounding villages with shops, services, a Doctor's surgery and a community centre.*

*We note the only matter approval is sought as part of this outline application is Access. The matters of Appearance, Landscaping, Layout and Scale have been categorised as 'reserved matters' to be the subject of a separate application before the development may proceed.*

*We make our comments on two counts as they are interrelated and will effect the residents of Chilmark as well as other neighbouring villages.*

#### *1. Access*

*Tisbury, unlike every other Local Service Centre in Wiltshire is the only one with no A or B road giving access to the village.*

*Consequently all traffic in and out of Tisbury, from whichever direction, is obliged to negotiate narrow country lanes often with long stretches of single track and through small villages with houses standing on the road edge. Chilmark, with 20mph speed calming and a village school, is already coping with increasing numbers of private, commercial and HGV vehicles cutting through from the A303 and frequently damaging the edges of conservation area stone walls and grass verges.*

*Negotiating restricted road conditions already presents a challenge for local residents of rural communities. A 40 bed care home is not mixed use as understood by the Tisbury Development Plan and does not provide for any local business enterprises or local jobs. Given the shortage of care home workers, it is likely these will need to come from a wide catchment area and travel to Tisbury, increasing road traffic through villages i.e. 'out commuting'.*

*The proposed density of housing with its associated increase in vehicles together with the car journeys necessary to provide 24 hour shift staffing for a 40 bed care home will lead to significant traffic increases, night and day on all approach roads and through Chilmark village itself.*

*This increase in traffic is not merely a noisy and disruptive intrusion but also dangerous to the inhabitants walking through streets with no pavements. Wiltshire Core Strategy states ‘modest new growth in Tisbury will...take into account narrow access roads and the sensitive landscape of the AONB’.*

*The proposed access to Tisbury from Jobbers Lane through the AONB Vale of Wardour presents insurmountable traffic restrictions, with long lengths of narrow pinch points and single track road.*

*The closure of one of the railway bridge arches will cause congestion in and out of Tisbury. The closed railway bridge is the one used for vehicle access to Tisbury when the other arch is flooded. A frequently occurring event. Traffic lights are an urban intrusion to Tisbury and inappropriate to its rural location.*

*The suggested steel and concrete footpath running the length of a closed railway bridge does not provide an appropriate (or fitting) solution to accessing the shops on Tisbury High Street.*

*Without a bridge over the railway, pedestrians from the proposed development will be obliged to walk a circuitous and lengthy route with their shopping. This will force residents to use cars for these short journeys.*

## *2. Density*

*The proposed plan overdevelops the site with residential housing making no provision for mixed development (e.g light commercial/small business) which would provide local employment as envisaged by the plans referred to below.*

*The vision set out in Wiltshire Core Strategy 2015 states that by 2026 service centres such as Tisbury ‘will become more self contained, giving a reduction in the need to travel and minimising out commuting’*

*The scale of the proposed development is not in line with the Wiltshire Council Local Plan 2021 (Empowering Local Communities) which provided for 65 dwellings by 2036 i.e equivalent to 4 a year. The housing density vastly exceeds this. Instead of the envisaged gradual growth in housing Tisbury Doctor’s surgery will not be able to accommodate the needs of what would amount to an immediate increase of 15%/20% to the population of Tisbury.*

*Parking in Tisbury is already problematic but manageable. The High Street is a narrow thoroughfare, often only able to accommodate a single vehicle moving along parked cars. Additional vehicles from shoppers will outnumber the parking spaces that can be provided.*

## *Conclusion.*

*Chilmark Parish Council believe the application should be refused consent. The plan submitted does not provide for the range and scope of development nor reflect the aims as defined in the Wiltshire Core Strategy or the Wiltshire Council Local Plan (Empowering Local Communities) or the Tisbury Neighbourhood Plan and its scale will significantly contribute to increased traffic levels in an AONB with narrow road conditions through small villages.*

## Donhead PC: Object

- *Overdevelopment of site / not in line with the local plan*
- *Wrong category of onsite employment / not in line with the local plan*

- *Object to the notion of blocking off one side of the railroad arch to provide pedestrian access.*
- *Insufficient local infrastructure to cope with proposed develop.*
- *Should be at least 30% affordable housing.*

#### Access to Tisbury Group

*Having reviewed this Outline application we conclude that it does not provide what Tisbury needs or the sort of development envisaged by the Tisbury Neighbourhood Plan.*

*The proposal is contrary to the basic development principles clearly set out in Wiltshire Core Strategy 2015. Principles that we would fully endorse. For example, modest levels of development, modest growth of both housing and employment to ensure development is balanced, minimising out-commuting, becoming more self-contained.*

*The scheme has excessive residential and care home accommodation at the expense of a more mixed and sustainable development, which would develop the community as a whole. The current proposal will promote a dormitory for the wider region.*

*The exclusively residential nature of the development, its density and its scale will result in high and unacceptable traffic generation causing not just damage to our environment, but also to the well being of our residents and communities on these access routes into and out of Tisbury.*

*The High Street and the surrounding narrow country lanes with their constrictions which give access to Tisbury have absorbed Tisbury's residential expansion and associated growth in traffic over many years. Blockages, conflicts and aggression now occur on these roads on a regular basis and further expansion on the scale proposed cannot be accommodated without these issues becoming more serious and difficult to manage.*

*The recent flooding in Tisbury has demonstrated that the access to the proposed development will be compromised by flood water from the Nadder river and we can expect this to become a more frequent occurrence with climate change.*

*A van disabled by the recent floods, prevented traffic from passing through one of the railway bridge arches and reinforced the need for resilience and a second arch for traffic.*

*The scheme lacks respect for the Tisbury and wider community.*

*On the basis of the above we believe this application should be refused consent.*

#### AONB Partnership (summary)

*11. This AONB is, as I expect you know, in one of the darkest parts of Southern England and hence the visibility of stars and, in particular, the Milky Way, is a key attribute of this AONB..*

*12. The AONB is, therefore, concerned about light pollution. Any external lighting should be explicitly approved by the Local Planning Authority and comply with the AONB's Position Statement on Light Pollution and the more recent Good Practice Notes on Good External Lighting and Paper by Bob Mizon on Light Fittings. In this location that means all lighting complying with Environmental Lighting Zone E1 as defined by the Institute of Lighting Professionals 2011.*

*13. The site is in the Vale of Wardour landscape character area of the Rolling Clay Vales landscape character type of the AONB's landscape character assessment. Greater details of the landscape, buildings and settlement characteristics can be found in the Landscape Character Assessment 2003. That document can be viewed in full on our website.*



14. Although the application is a mixed development up to 86 dwellings and a care home up to 40 bed spaces, that description seems to differ from that provided in many of the consultation reports attached to the application. Furthermore, the submitted proposals do not appear to be a 'mixed' development. The site is stated to be 4 hectares although, again, some of the consultants' reports give a different figure.

15. A significant part of it is a brownfield site that is identified as contaminated land. However, a substantial area on the south eastern side appears to comprise semi-natural habitats. There are indications that there are protected species on site with significant habitats adjacent to it. There is no mention of the site including any matters of geological importance. Nevertheless, the site boundary appears to include all of the slope to the south east.

16. The application, and many of the consultants' reports, are confusing because the orientation of the site is oversimplified in many of the descriptions. The basic geographical elements of aspect, topography, and orientation are missing from most of the documentation. The site is, in fact, roughly a narrow oblong orientated along a line from the north east to the south west. It is to the south east of the railway station and at a similar or higher level than the railway. The south eastern side is a relatively steep slope, presumably produced at some earlier time when the full extent of the site was created. The top of the slope is approximately 115 metres AOD, whereas the site level is in the order of 95 metres AOD. The road at the south western end, which goes under the railway line, is at a lower level and, as is noted in some of the documents, is prone to flooding.

17. The whole of the site is within this AONB and I note that the north western boundary of the site adjoins the Tisbury Conservation Area. The application form indicates that there would be a loss of employment land of some 4295 sq metres with an attendant loss of 21 employees. The proposed employment generated, presumably by the care home, would be 40 full time equivalents. The increase in car parking spaces would be 151, and whilst it is noted that the application is for up to 86 dwellings, 74 would be market and 12 would be affordable. Bearing in mind the acknowledged need for accommodation in and around this AONB is for affordable properties, that seems to be a rather low proportion.

18. From my engagement with the Tisbury Neighbourhood Plan I am aware that there are some key concerns in relation to development and redevelopment around Tisbury Station.

a) A particularly pressing matter is the provision of parking so that the use of sustainable transport, the railway, can be encouraged. The current roadside parking is not only unsightly, but it also aggravates the restricted traffic flows to and from the southern side of Tisbury.

b) The Neighbourhood Plan team were also keen to ensure that redevelopment would provide a variety of jobs that would enhance the sustainability of the community.

c) Flooding is an issue and, associated with that, the control of pollution is a significant matter.

d) The landscape corridor of the River Nadder is a key feature of the settlement and any redevelopment should both respect and reinforce the character and qualities of that landscape corridor.

e) It is my understanding that the Neighbourhood Plan deliberately avoided making design comments about redevelopment around the station so as not to prohibit innovative approaches.

However, the submitted application does not appear to actively address any of these issues and concerns.

19. Having reviewed the documentation the AONB Partnership is of the view that the submitted scheme fails to comply with the Neighbourhood Plan, fails to present a scheme that is positively related to the landscape

*location and context, and lacks imagination.*

*20. The AONB Partnership welcomes the setting aside of land for the expansion of Tisbury Station. It would, however, be more convincing if that expansion scheme were included in some detail so that everyone could be confident that sufficient space is being made available for what is clearly a desirable expansion of sustainable transport. From the AONB Partnership's position this is the only railway station within the AONB that enables visitors and inhabitants to travel sustainably to and from one of the largest Areas of Outstanding Natural Beauty in the nation.*

*21. The submitted reports and documents appear to be more in the role of supporting a scheme that had largely been decided upon rather than informing and contributing to the design and layout processes. The Design and Access Statement appears to support that conclusion as its section on Design Evolution has little on the landscape character of the context of the site, and there is no evidence of exploration of innovative or imaginative uses or solutions that would address the issues identified in the Neighbourhood Plan. Clearly those matters are of considerable concern to the local community and the AONB Partnership.*

*22. I note that the application seeks permission for access, with all other matters reserved. That does, however, mean that if granted the principle of a development in the form presented would be acceptable. That has a clear implication that landscape, community, flooding, parking, and sustainability issues have been fully considered. On the basis of the scheme presented, the AONB Partnership has to advise most strongly that the issues have not been adequately covered to consider an approval.*

*23. The AONB Partnership is well aware that the roads to and from Tisbury are less than adequate for a Local Service Centre. Nevertheless, residents in the AONB do drive to Tisbury not just for the shops and services but also to use the railway. It seems, therefore, that use of the railway and access to Tisbury are major issues that do have to be addressed in any development or redevelopment.*

*24. Turning to specific aspects of the submission, neither the Design and Access Statement nor the Planning Statement have full regard to Wiltshire Core Strategy Policy 51 as both omit the final part of the policy relating to developments within AONBs demonstrating how development proposals take account of the relevant AONB Management Plan. Whilst one expects documents provided by an applicant to strike an upbeat note the D&AS seems to be going a bit too far on page 8 when it describes the road access to Tisbury as good! It is generally acknowledged that one of the severest limitations to Tisbury is the narrow and twisting nature of the roads that access it.*

*25. I have already mentioned the confusion within all of the documents when the south easterly and north westerly sides are sometimes referred to as such, and at other times referred to as west and east, and the north easterly and south westerly sometimes referred to as north and south. Furthermore, the reference to the access points to the site, at the south westerly end, are sometimes referred to as the western and eastern accesses, although in one case there is reference to the northern access. Fortunately, the reference to the railway arches is more consistent.*

*26. One senses from the Design and Access Statement section on Design Evolution that some fairly basic designs have been tried out before any strategy for development has been established. That may account for the somewhat unimaginative approach to what is, admittedly, not an easy site to redevelop.*

*27. The Planning Statement for a considerable part summarises the specialist reports and therefore carries forward their assumptions, assertions, or shortcomings. There is a consistent omission of reference to footnote 7 of the NPPF and the documentation, whilst keen to quote in full other parts of the NPPF, abbreviates and omits key elements of paragraphs 176 and 177. The proposal is, of course, a major development and the Planning*

*Statement appears to side-step that, and the NPPF guidance on AONBs and the tests to be addressed by major development proposals. The effects on the environment are only addressed in part, and what are the public interest issues and the exceptional circumstances?*

*28. The proposed traffic scheme on the road outside the site appears to provide additional urbanisation, through traffic lights, signs, and similar paraphernalia, within the Conservation Area whilst doing nothing to alleviate the existing parking situation, let alone making provision for a future enhanced level of parking.*

*29. The Ecological Report, somewhat unexpectedly, indicates that areas of the site with a north westerly aspect nevertheless provide habitat for reptiles. On the other hand, it would be unusual if the River Nadder landscape corridor did not support large populations of bats. The report quite fairly points out the negative impact of domestic cats on bird populations but one significant gap in the report is the lack of focus on small mammals and the negative impact of cats on them. It should also be noted that the purpose of a Landscape and Ecological Management Plan is not primarily to focus on ecological matters. It is to ensure that the landscape integration and mitigation is speedily and successfully achieved and then appropriately and effectively managed thereafter. Obviously, the environmental mitigation and enhancement needs to be included so such documentation needs to be prepared by an appropriate qualified and experienced landscape professional in collaboration with experienced ecologists.*

*30. The submitted reports provide little basic description about the site and its surroundings, and the Ecology Report comes closest to providing an understanding of those aspects of the site. Nevertheless, the inter-relationships between the various reports seem minimal, and the influences of the various features, such as the grassland, scrub, and wooded areas on the character and qualities of the site, particularly the contribution to those aspects of the south easterly bank and the south westerly entrance area, are unclear.*

*31. Whilst one might anticipate that an Ecology Report would welcome any native trees and hedges, I have not seen in any of the reports any focus on the practicalities of these features, as shown in the illustrative sketches from the architects, being successfully established on a brownfield site where there is clear acknowledgement of extensive hard surface platforms and contamination. Without attention to these matters any scheme and associated sketches have to be regarded as simply aspirational.*

*32. The LVIA, on page 5, seems to misunderstand the NPPF. It does correctly quote Wiltshire Core Strategy Policy 51, although there is no demonstration of how the AONB Management Plan has been taken into account. It also correctly, page 9, quotes from this AONB's Integrated Landscape Character Assessment that development pressures around Tisbury and loss of character are key issues. However, it does not provide the landscape context and basic geographical and topographical details to facilitate an understanding of the location of the site, and its location in relation to other significant landscape features and elements. It seems to underestimate the importance of the character of the site as seen from the station and the trains, seemingly overlooking the fact that the trains provide a means for many people to see and appreciate the landscapes of this AONB. I am also concerned by the lack of emphasis on a landscape management plan for the whole site, including designed open spaces, the south westerly access area, and the extensive south eastern slope. It may well be a reflection of the brief given by the client, but the document appears to be supporting the development rather than informing and contributing to the design proposals for the totality of the site in the context of its local environment.*

*33. There are references to tree planting, and allowing existing planting to grow out, on the south eastern slope. There does not, however, appear to be any consideration of the shading of the proposed development by that slope and the planting, nor shading of ground cover and shrub habitats by those trees.*

*34. The AONB Partnership welcomes the positive approach of the applicant to a 106 agreement and planning conditions, but these do not appear to be particularly unusual, outstanding, or innovative. The AONB Partnership is concerned that despite the number of documents submitted many fundamental matters remain to be addressed and little attention appears to have been given to AONB matters and policies addressing AONB issues. The submitted scheme seems rather limited, does not address key matters identified in the Neighbourhood Plan, and lacks an imaginative approach to what is widely acknowledged to be a challenging*

*brownfield site.*

*35. The AONB Partnership is very concerned that none of the submitted documentation recognises, let alone takes account of, the AONB's status as an International Dark Sky Reserve. The Lighting Report seems to consider only lighting of the spine road, and the station's dark skies compliant lighting is not acknowledged. There are significant shortcomings in all of the references to lighting, including the Ecology Report, and I attach as an annex to this letter an appraisal of the situation by the AONB's dark sky advisor.*

*Salisbury Civic Society - Object for the following reasons:*

*Despite the amount of information presented with this application the proposal's urban design is expedient and needs to be fundamentally reconsidered. The Station works site, as the name clearly suggests, is defined by its immediate proximity to Tisbury's railway station. Unlike the village, however, it is on the 'other' side of the tracks and tightly constrained by a steep embankment to the south and the train line itself to the north. Its access, situation and industrial heritage are necessarily difficult and need particular designs to address these fundamental givens. The plans presented do not rise to this context and instead present an expedient solution for access and a generic layout for the housing itself.*

#### *Access*

*There are two lanes of vehicle traffic entering the village from the south. In the proposal one of these is given over for pedestrian access to the development site. This compromise to an already difficult village access is, certainly, unacceptable to everyone other than the developers. To make matters worse for the village this expedient solution depends on an ancient pedestrian right of way across the corner of the site and railway tracks being extinguished. Both of these 'solutions' are surely nonstarters and a more fundamental strategy for dealing with pedestrian access should have been addressed at the onset of the designing.*

*There is mention and some allowance given to the ongoing idea of the single train line and station platform being doubled into the development site. This would be a benefit to the rail users by ridding the waiting time getting through the Tisbury bottleneck and, of course, to the environment by making public transport more attractive. To work this extra platform will need pedestrian access either tunnelling below or bridging above the tracks. There is an obvious opportunity and synergy for the railway and the developers to share this access between themselves yet is conspicuously missed in the limited 'options' presented.*

*The idea of housing and business opportunity on this site is certainly a good one and, as it is set out in the village's Local Plan, clearly desired. The developers have interpreted this brief by including a care home amongst their private housing. This is a good and hopefully a generous idea as it gives the project potential for meaningful place making and the inclusion of an older generation.*

#### *Site Layout*

*Again, it is a difficult and particular site between the steep embankment and the railway line. It is north facing and has vehicle access from one end only and a history of industry and a tectonic of large sheds. Likewise, the site is remarkable for its potential to exploit these givens; a hillside to work with, north light to benefit from, views into the village, working with and adding to an established natural landscape, long runs of building and making the movement of pedestrians as simple and interesting as possible.*

*The urban design presented, however, misses both the opportunities of the site and its proposed programs or uses.*

*The care home, rather than being central to the scheme, is banished to the corner of the site. The requisite public open space, rather than being integrated into the plan, is simply placed in the centre of an elongated cull*

*de sac surrounded by car parking. Why this open space was not shared by care home residents to both enliven their lives while benefiting from their passive surveillance is certainly a missed opportunity. Instead, it would appear another expedient and banal lawn (soon to be fouled by dog excrement) as small as possible to fulfil a planning obligation.*

*The housing itself might have used the hillside to help hide its parking, grab views across the train line, benefit from the limited solar gain, or engage with the existing landscape. Instead it is placed symmetrically either side of central road with suburban housing stamped out as if it were in (another) boundless green field site with no consideration of its east to west orientation. There were at least two further and obvious 'options' where the road was either side of a single run housing yet these were conspicuously absent.*

*Even the flood attenuation pond at the end of the site belies the expediency and lack of ambition in*

*this development proposal. In today's age of a climate crisis, ever more flooding, and an increasing loss of natural habitat any urban design should rise above the minimum required and have ambitions to help solve the problems rather than do as little as possible. This development can and should include integral green and blue infrastructure strategies, orient buildings for passive solar gain and passive surveillance, promote dense yet interesting housing, minimise the presence and use of cars and promote and make easy pedestrian movement.*

*This proposal does not rise to the challenges and opportunities of the site and needs to go back to some urban design basics.*

## **9. Planning Considerations**

### **9.1 Principle of development, policy and planning history**

The LPA is unable to demonstrate a 5 year land supply (currently confirmed at 4.7 years) and the provision of additional housing in sustainable locations is generally supported in principle. The current situation in the South HMA (Housing Land Supply Statement April 2021 and published April 2022) is that there is a deficit of 68 dwellings to be provided

However, the presumption in favour of sustainable development or tilted balance does not automatically apply to this site under para 11 of the current NPPF . Footnote 7 includes habitats sites (and those sites listed in paragraph 180) and/or designated as Sites of Special Scientific Interest. This includes the Area of Outstanding Natural Beauty, Chilmark bat SAC and the River Avon SAC catchment, and areas prone to flooding. Therefore, in officers opinion, the "tilted balance" is not applicable in this case where any harm is identified to these sites. For decision taking in the absence of a 5 year supply, para 11 requires:

*where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>7</sup>; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

The site is within the settlement boundary of Tisbury. The adopted Tisbury Neighbourhood Plan specifically allocates the site for development as part of Policy BL7, as reproduced below:

### *Policy BL.7 Site Allocation: Station Works*

The site of Station Works, as identified on the map, is allocated for comprehensive redevelopment to include an appropriate balance of housing, commercial units and parking.

The mix for the development should be informed by a viability test. Development proposals should be set down in a Masterplan which has been the subject of consultation with the community and the other interested parties. The Masterplan should indicate the phasing and infrastructure requirements and how their delivery will be assured. Once agreed, development should proceed strictly in accordance with the Masterplan.

The Masterplan shall be in accordance with the other policies set out in this plan and in addition:

1. Proposals should be informed by a contaminated land survey and remediation scheme, the level of information provided to be in line with the Wiltshire Core Strategy.
2. Liaise with Network Rail (and other parties as required) to identify and safeguard land to meet their current and future operational requirements including appropriate access and parking provision for the southern side of the line.
3. Make provision for an appropriate pedestrian accesses to and from the new development and the rest of the village; and show how this is to be phased, as part of the development.
4. The estimated capacity of the site is 60 dwellings in two storey buildings plus commercial uses, but density overall must be appropriate for the edge of a rural settlement in an AONB with the potential to impact on the Conservation Area and two Special Areas of Conservation (SAC) (the River Avon SAC and the Chilmark Quarries SAC).
5. The Masterplan design and layout should detail the proposed:
  - i) mix of uses
  - ii) areas of public, private and amenity space
  - iii) movement routes for different users (into and out of Tisbury Railway Station)

- iv) employment, residential and parking areas
  - v) building heights, envelope and density
  - vi) phasing of different uses
6. Make appropriate provision for affordable housing in accordance with Policy BL.2, at a minimum level of 30% in accordance with Wiltshire Core Strategy Core Policy 43. Opportunities for self-build should also be explored
7. Make provision for commercial uses, having particular regard for the needs of local and current on-site business, in accordance with Policy BL.3.
8. The residential and commercial development should be sensitively sited and designed to mitigate any associated adverse impact (such as height of buildings, noise, smell, pollution and visual impact) arising from either use; or from the use of the railway
9. The development must reflect the site's setting within the CCWWD AONB and its proximity to the Conservation Area. This should include consideration of the impact of traffic on the neighbouring settlements, the natural landscape and historic buildings in the CCWWD AONB, the effect on the skyline for potential light pollution and views from the south facing areas in Tisbury and the sensitivity of design, in relation to the vernacular of the adjacent Conservation Area zones. Landscaping should positively reinforce the site's setting in an AONB for all users and where possible result in a net gain for biodiversity in accordance with *Policy HNA.1*
10. Development should be of a very high design standard, reflecting the predominant local vernacular, e.g. use of local brick and stone building materials which predominate on the southern edge of the village and Tisbury Railway Station
11. All necessary species and habitat surveys must be carried out to determine the extent to which the development would affect the bat species that are features of the Chilmark Quarries SAC and appropriate measures taken to avoid and mitigate impacts to roosts, foraging and commuting habitats
12. Development should strive to have a minimal (approaching zero) environmental impact in its use of natural resources such as energy and water and consider how the development can have a positive environmental impact. Wherever viable, masterplanning should utilise industry best practice on integrating principles of sustainable, low-carbon design, including the use of renewable energy and energy efficiency (e.g. BREEAM Communities)

Tisbury is classified as a Local Service Centre within the WCS settlement hierarchy. The role of Local Service Centres is to provide for a significant rural hinterland providing for local employment opportunities, communities facilities and/or affordable housing provision. The broad principle of development within the defined settlement boundaries is established, subject to proposals meeting other policies of the development plan.

WCS Core Policy 27 sets out the policy approach for the Tisbury Community Area. Key issues and considerations for Tisbury are:

- To maintain Tisbury's role as a local employment centre;
- To address a lack of tourist accommodation in the area;
- To ensure that new development is sympathetically designed to enhance local distinctiveness;
- To conserve the landscape of the AONB; and
- To ensure that any new development at the station works site explores the opportunity to provide additional parking for the adjacent railway station.

In relation to policy BL7, the key matters are:

### Masterplan and public consultation

The preamble text to the above policy BL7 indicates that a Masterplan should be created in consultation with other third parties and the community, and the policy indicates the Masterplan must address the 12 criteria listed by policy BL7. This report assesses whether the submitted scheme address the 12 main aims and objectives of the above policy. Most of the aims are discussed in other sections of this report, but some main principles are explored below.



There is no formal definition of what a Masterplan should contain in national or local planning guidance, other than it is a framework for the redevelopment of an area or site. The NPPF states that at para 132:

132. *Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.*

Policy BL.7 of the TNDP states that:

*Development proposals should be set down in a Masterplan which has been the subject of consultation with the community and the other interested parties. The Masterplan should indicate the phasing and infrastructure requirements and how their delivery will be assured. Once agreed, development should proceed strictly in accordance with the Masterplan.*

The appropriateness of the inclusion of a requirement for a masterplan was considered by the independent examiner for the TNDP:

*... the Qualifying Body has commented that "masterplans developed in partnership with the local community, LPA and developer are a requirement of Core Policy 2 of the Wiltshire Core Strategy for strategically important sites and more generally required within the supporting text and although this site does not form a strategic site as part of CP2 it is important to the Tisbury Community and is in effect strategic to Tisbury. The community also want to ensure a good development is delivered. Tisbury wish to follow the example of the Wiltshire Core Strategy and is felt to be a reasonable approach. A masterplan approach does not need to be too onerous; the community simply asks to be part of and consulted on the masterplan development so that this can be agreed with the community prior to any planning application being submitted and thereby reducing or eliminating any objections that may be received if a planning application is submitted 'cold'. This would also enable any discussion to be had with the new owners over why or not they are proposing to include any elements of infrastructure requested and enable discussion with Network Rail."*

It is clear from the submitted Statement of Community Involvement that the applicants have engaged in a range of efforts to engage with the community and parish councils, and the results of this engagement have led to a number of adjustments to the proposals that are now presented. However, given the volume and nature of the various third party comments, the scheme is not considered to be acceptable by many local people or the relevant Parish Council's.

In summary, engagement appears to have comprised the following:

- Engagement with the Wiltshire Council highways officer and the Council ecologist;
- Formal pre-application request to Wiltshire Council planning department and highways officers;
- In principle discussions with Network Rail, and formal pre-application request and response from Network Rail;
- Tisbury Surgery/Wiltshire Clinical Commissioning Group regards care home
- Tisbury Parish Council/West Tisbury Parish Council/Local Ward Councillors, including initial meeting to introduce proposals and indicative layout; Site meeting to discuss proposals in more detail, attendance at public meeting (Victoria Hall), further meeting with Tisbury Parish Council to review outcome of public consultation

- Community engagement, including Virtual consultation from 6<sup>th</sup> May to 6<sup>th</sup> June 2021, including dedicate website, delivery of approximately 1,400 leaflets to all residential addresses in Tisbury village, explaining the proposed development and how to respond to the consultation.

The applicants Planning Statement acknowledges that the responses from the community have been both positive and negative (at paras 7.4 & 7.5), and provides a useful table of the general types of responses, as below:

SUPPORT/POSITIVE	CONCERN/NEGATIVE
Site is an eyesore and needs redeveloped	General concerns that the site is being overdeveloped
Housing is needed in the village, especially for younger people/families.	No provision of a bridge or tunnel over/under the railway
Affordable housing is needed in the village.	Traffic lights will cause delays/congestion, and are not needed
Local roads are unsafe for pedestrians and speeding is an issue.	Care home is too large/not needed
Rail safeguarded area supported by Network Rail.	Block of flats is bulky and affects setting of a listed building.

In response to the above, the applicants indicate that the final scheme as submitted was adjusted thus:

- The size of the proposed care home has been reduced from 70-bedspaces to 30-40 bedspaces. This will also allow the provision of community medical facilities within the same building footprint on the site, which could also facilitate new premises for Tisbury surgery.
- An indicative footpath route up the landscape bank to the south of the site has been deleted, both to avoid conflict with adjoining private landowners and also to protect wildlife habitat on the bank from encroachment.
- Although indicative only, the layout for the block of flats has been amended to split the flats into two smaller blocks rather than a single large block, thus reducing impact on views from the listed former station hotel.
- The proposal will include traffic signal sensors which will reduce average wait times at the lights still further at quieter times.
- The pedestrian footway/cycleway under the Three Arch Bridge has been reduced in height further following analysis of updated flood data, thus further reducing its impact. (Use of the third arch of the bridge was investigated. This arch carries the River Nadder, part of the River Avon SAC system. Use of this arch for the pedestrian/cycleway would involve culverting the river at this point, as well as removing significant amounts of trees and other vegetation. This option is not therefore considered acceptable in landscape, heritage or ecological terms by the developer).



Given the nature of the third party concerns expressed as part of this proposal, officers had suggested to the applicant that further discussions may be appropriate with the public, in order to address some of the concerns. Whilst the applicant indicated recently that it may indeed discuss matter with Tisbury PC, no further details or adjustments to the application scheme have been forthcoming.

### **Housing need and quantum**

Point 4 of policy BL7 indicates that the “estimated capacity” of the site is considered to be 60 dwellings. The current proposal envisages 86 dwellings, and up to a 40 bed care home (erroneously indicates as a 70 bed in parts of the submitted documents). The applicants argue that there is no real basis for 60 dwellings, and that the site is capable of taking more housing, and that the scheme makes efficient use of the land. Members should note that the housing allocation figures in the Development Plan are also intended to be “at least” figures.

In officers opinion, the elongated application site is of a significant size, and the submitted indicative plan appears to indicate that 86 dwellings and a care home could fit onto the site without any significant harm resulting in terms of the final scheme being overdeveloped or cramped. Whilst the concerns of the Council’s Urban Designer, Landscape officer, and Conservation officer are noted, it has been agreed with them that most the detailed concerns they have referred to in their submissions can be dealt with as part of any future application for the detailed design and layout of the buildings and the site. The Council would however also like to see any future application being submitted with a supporting Design Code document or similar (as previously promised by the applicant), which clarifies the qualities of the materials, landscaping, and architectural detailing, and how they are complimentary to and would enhance the site and the general area.

### **Care home / employment uses**

TNDP policy BL.7 sets a requirement in addition to the delivery of approximately 60 dwellings, for the development of: *‘commercial units, having regard for the needs of local and current on-site business, in accordance with Policy BL.3’*

The exact quanta of commercial development is not specified by the policy. It is explained within the supporting text that while business activities on the site have reduced over the past number of years the site remains Tisbury’s largest commercial site. The supporting text goes on to state:

*‘A business park comprising units of a size and form required by modern businesses could attract a diverse employment offer. This could provide for technology-focused businesses, or similar enterprises within use Class B1 supporting the needs of smaller local firms, as well as businesses moving into the area. This would help to minimise out-commuting by extending the availability of local employment opportunities.’*

Instead of industrial/commercial uses, the proposal suggests a 30-40 bed care home, located at the southern end of the site (it is noted that a few of the submitted supporting documents refer confusingly and erroneously to a previously proposed 70 bed care home)

The applicant’s Planning Statement argues that:

*The business and employment use of the Station Works site has been in steady decline for many decades, this despite its reasonably central location to the village. The relative distance from Tisbury to the main road network, combined with narrow and often winding lanes accessing the village, mean that the site no longer satisfies modern locational requirements for many businesses, particularly those requiring supply and distribution of goods.*

*The linear nature of the Station Works site makes locating more traditional business uses on the site challenging, whilst the significant costs of decontaminating the site mean that traditional employment uses would render the development unviable. Concerns have also been expressed during the community consultation regarding traffic impacts on neighbouring villages and narrow lanes. Locating further businesses on the site would be likely to exacerbate such issues due to commercial vehicle movements to and from the site on the surrounding local road network*

We would normally expect the application to be accompanied by evidence of a marketing exercise to support this assessment in order to justify a move away from the policy expectation. This would need to be broadly along the lines of criteria v. of WCS Core Policy 35:

*Within the Principal Settlements, Market Towns, Local Service Centres and Principal Employment Areas proposals for the redevelopment of land or buildings currently or last used for activities falling within use classes B1, B2 and B8 must demonstrate that they meet, and will be assessed against, the following criteria:*

...

*v. There is valid evidence that the site has no long term and strategic requirement to remain in employment use; the ability of the site to meet modern business needs must be considered, as well as its strategic value and contribution to the local and wider economy both currently and in the long term. It must be shown that the site is no longer viable for its present or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (at least 6 months), following genuine and sustained attempts to sell or let it on reasonable terms for employment use, taking into account prevailing market conditions.*

Regards care home proposals, policy 46 of the WCS indicates that: *In exceptional circumstances, the provision of specialist accommodation outside but adjacent to the Principal Settlements and Market Towns will be considered, provided that (inter alia):*

- viii. a genuine, and evidenced, need is justified*
- ix. environmental and landscape considerations will not be compromised*
- x. facilities and services are accessible from the site*
- xi. its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement.*

With regard to the care home element of the proposal, the requirement of criterion viii of WCS Core Policy 46 does not appear to have been clearly addressed, with regard to demonstrating/evidencing the need for a care facility in this location. The Council's current data on need is from 2011. New data is currently being gathered on this point, and is initially suggesting that there is limited need in the Tisbury area, and not enough to support a 30-40 bed care home. However, the emerging figures only relates to care homes which provide financial support from the Council. It does not include self funding private care need.

Provision of a care home is not referred to in Policy BL7, but other housing policy in the Tisbury NP does refer to care home requirements (BL1 & 2). In justification, the applicants state that:

*The development of a 30-40-bed care home, together with associated medical facilities, represents a commercial use as well as providing supported accommodation for older people, for which there is an acknowledged need in the area. The care home and medical facilities use could be expected to provide in excess of 40 full and part-time jobs in a range of skills and functions, providing significant employment in the local area. This would also represent an increase in employment from that existing on the site now, which is estimated to be 20-22 full and part time jobs... The care home use will provide much needed local employment, whilst also being a use compatible with a residential development.*

The applicants viability assessment envisaged an alternative scheme containing 86 houses, and 8 industrial units (in lieu of the care home). This assessment indicated that if the current proposal were to be altered to be more in line with the allocated policy BL7, then the alternative scheme would not be viable enough to provide policy compliant affordable housing. So it appears that even if a more policy-compliant scheme were to be put forward, that scheme would be unlikely to provide the full required amount of affordable housing on the site. (Members should note on this point that other S106 contributions could be reduced to compensate, but either way, the impacts of the scheme would not be fully mitigated).

### Summary

The scheme would not provide the type of industrial employment which is referred to by policy BL7. Furthermore, the number of dwellings proposed would exceed that required by TNP policy BL7 and current estimates for the area. Additionally there remains no submitted justification for this scale of care home to serve the Tisbury area. No detailed layout plans have been provided which indicate how such a proposal would incorporate a medical facility or how large it would be, or whether such a facility is available to the wider public, and if so, would there be sufficient parking on site.

However, in discussions with the relevant Council departments, it is considered that the provision of 86 dwellings (26 approximately about the suggested figure in the policy) would not cause a significant issue in a general land use planning or policy sense, particularly as the Council cannot demonstrate a 5 year housing supply, and because the housing figures in the Development Plan (of which the Tisbury NP is part) are “at least” figures, not limits or targets.

Additionally, it appears that a more policy compliant scheme containing industrial units would also not be viable enough to provide the full quota of affordable housing required by policy CP43. Furthermore, the provision of a care home would at least provide a form of local employment, and would provide a local community facility in the broadest sense. Whilst limited justification has been submitted by the applicant, the Council’s own evidence related to care home need dates from 2011, and new evidence is only currently in the process of being compiled. Whilst this is current indicating that there might be limited need, it however seems unlikely that any such report would indicate that there was no need for a care home, and it is noted that the current adopted Tisbury Neighbourhood Plan suggests that there is currently limited provision of such accommodation in the area. Therefore there is likely to be some public benefit resulting from the provision of a care home and possible medical facility, which would weigh in favour of the proposal.

Thus it is considered that whilst the scheme would not achieve the balanced mix of commercial employment units and housing envisaged by policy BL7 of the Neighbourhood Plan, a public benefit would result from the provision of a care home, and the provision of 86 dwellings would contribute modestly to the Council housing land supply.

### 9.2 Design, scale and impact to the amenity of the area, including the adjacent Heritage Assets

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise. At the current time of the statutory development plan in respect of this application consists of the Wiltshire Core Strategy (WCS) (Adopted January 2015); Section 66 of The Planning (Listed Building and Conservation Areas) Act 1990 requires ‘special regard’ to be given to the desirability of preserving a listed building or its setting; Section 72 of The Planning (Listed Building and Conservation Areas) Act 1990 which states that in the exercise of any functions, with respect to any buildings or other land in a conservation area, under or by any virtue of any of the provisions mentioned in this Section, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area; and the relevant ‘saved’ policies from the Salisbury District Local Plan (SDLP).

Policy BL7 criterions 4,5,9 & 10 refer to the design of the scheme, and its impact on the wider landscape of the AONB and the Conservation Area. Policy CP51, 57 & 58 of the WCS are also of relevance to these matters, as are the relevant sections and paragraphs of the NPPF related to design, heritage assets, and landscape impact.

The existing industrial site is considered to be in a poor visual condition, and rather at odds with its rural fringe location adjacent the Conservation Area. The removal of the existing industrial buildings could potentially offer a general visual improvement to the area. However, the site is located in a prominent and elevated location and visible from Tisbury and the wider countryside of the AONB.

The applicants Planning Statement explains the illustrative layout thus (extract):

- *The Site Layout is linear in form, structured along a street which is parallel with the railway line, albeit with subtle variations in geometry. The street is punctuated by a square at the centre of the site, which (either in the event that the railway is dualled or not) creates a secondary access and forecourt to the Station.*
- *Of the two existing access points from Jobbers Lane, the eastern one is used for vehicular access as it provides better visibility splays, whilst the western one is retained for pedestrian access.*
- *The wooded banks which flank these two access points would be retained largely in their present form, as they have ecological value and act as a characteristic rural approach to the village from the south.*
- *The square next to the Station is a focal point for the development and could permit future access to the station and an alternative route to the village centre via a station footbridge. This footpath link would however be dependent upon any future rail improvements proposed by Network Rail. In the interim period, the site would not have access to the existing Chantry pedestrian level crossing or public footpath at this northern end of the site. This is in response to concerns expressed by Network Rail on safety grounds.*
- *Built form is in terraces, semi-detached and detached buildings at 2, 2.5 and 3 storeys.*

The Council's Conservation officer has raised the following points:

*The first thing I note is that this is an outline application presumably seeking in principle support for development at the site, hence the absence of a detailed layout. I note that James Webb of Forum Heritage has supplied a heritage statement (marked draft) dated October 2020. James is familiar with the historic development of Tisbury having part authored the Tisbury Conservation Area Appraisal.*

*James identifies the designated and non-designated heritage assets that are potentially affected by the proposals. He also includes a plan, within the appendices, that identifies key views and also 'zones of sensitivity'. I agree with James' assessment in respect of his identification of the heritage assets likely to be impacted by the development and also note his plan and would concur with the flagged up 'zones of sensitivity'. I hope the developers will pay heed to areas of sensitivity that are flagged up in the report.*

*At pre-application stage I did not submit an outright objection to the development of the site on the basis of harm to designated heritage assets and their settings. I concur with James (his paragraph 7.4) that the site could be developed without harming the setting of the conservation area or the setting of heritage assets, and indeed, could offer improvements given the nature of the existing site.*

*We have an indicative layout plan which might seem to suggest that the proposed care home is within one of the 'zones of sensitivity'. I therefore have reservations about siting this building in this location. However in the absence of a detailed design, together with a heritage impact assessment from Forum Heritage, and schematic views relating to the views identified at figures 9/10 (view from Vicarage Road outwards towards the site) and figure 11 (view from the High Street looking southwards towards Bridge House) I am unable to assess the actual impact of the proposals and must reserve judgement until details are submitted (my emphasis)*

The Council Urban Design officer has also raised some issues with the overall design concept of the scheme, as below (summary)

*The development proposed is conveyed by the 'Sketch Site Layout' and D&AS which comprise the 'Masterplan design and layout' required in point 5 of NP Policy BL.7 for the site (apart from 5vi) phasing of different uses is not indicated). For my reasons below this would not accord with the high standard of design and place shaping required by Core Policy 57: in its context and setting it would appear a distinctly concentrated mass and suburban built form out of character within this surrounding landscape setting detached from the main built up settlement of Tisbury by the river meadows. ...Point 4 of the NP Policy BL.7 states the estimated capacity of the site for the Masterplan as 60 dwellings in two storey buildings whereas about 86 dwellings appear to be shown and a significant number of these incorporate three storeys ( as attic (houses) and part attic (apartments) second floor levels). This would suggest creating room for more strips and pockets of landscaping including tree planting creating a fragmented massing of buildings across the length of the development.*

The Council's Landscape officer has indicated that (summary):

- The illustrative sketches provided in the DAS are quite useful however sketch 4 illustrates a 3 storey building, larger than policy requirements, and a footpath is illustrated but this is not included on the plan. Sketch 5 demonstrates the large size/scale of the residential care home which is at odds with the scale of the townscape. It should be noted that the trees filtering views onto the site are in residential gardens and cannot be relied on for visual or landscape mitigation.*
- The application included a Landscape and Visual Appraisal. This was undertaken in two stages, initial baseline appraisal followed by an assessment of the scheme. The overall outcome is that there will be some beneficial landscape and visual effects in terms of restoring a degraded landscape into one with opportunities to flourish. The mediocre scheme would suggest that the masterplan development was not 'landscape led'. The mitigation proposed is limited to native trees and hedges within the development and its perimeter to provide screening, the latter is not obvious in the masterplan and the former is within residential garden, therefore unreliable.*
- The planning statement, at paragraph 6.25, explains that the layout of the site has been designed to incorporate important views in and out of the site. It includes the 'verdant backdrop' to the southeast, to be retained and enhanced. There is no information of the proposed enhancement measures on the illustrative plan.*
- There will no doubt be an improvement to the overall landscape and visual appearance of the site even though it is below community expectation. But even at this stage I would expect the illustrative masterplan to deliver a meaningful scheme. The Urban Design Officer has also pointed out some useful suggestions for tackling the design issues and in that regard, I defer to his comments.*

The concerns of the AONB Partnership regards the overall design and impact on the landscape are listed elsewhere in this report. The consultation response from Wessex Water (see Drainage section of report) also suggests that a final layout may need to be different from that proposed due to the presence of a water main running through part of the site.

## Summary

As a result of the above issues, the applicant intimated that a design code and other details would be prepared and submitted to address these points. However, to date, no such additional information has been submitted. It is also unclear how the part of the site within the railway protection area would be treated in the short to medium term prior to the land being required. The layout plan suggests that land would not be accessible, but the artists impressions supplied suggest the land would be utilised as a pathway serving the development. It is also not clear how this land would be accessed should this land be needed in future for the railway or how this may impact on the general amenities of development.

The sketch views provided also seems to suggest a built form differing from that shown on the indicative scale diagram. The submission appears to be a mixture of a previous and revised scheme. No schematic diagrams

have been submitted which may more show how prominent the development may be from certain viewpoints and the impact on the landscape of the AONB.

Notwithstanding, as the consultees allude to, the site is and has historically been visually detrimental to the wider area and the landscape, and the redevelopment of the site for a large quantum of development is considered acceptable by virtue of the allocation of the land by policy BL7 of the TNP. Whilst the redevelopment of the site would also be prominent in the wider area to the west, it is considered that such impacts could result in a visual improvement overall compared to the existing and historical situation, if a future scheme is of an attractive overall design, including materials, and landscaping.

In officers opinion, the elongated site is of a significant size, and the submitted indicative plan appears to indicate that 86 dwellings and a care home could fit onto the site without any significant harm resulting in terms of the final scheme being overdeveloped or cramped. Whilst the concerns of the Council's Urban Designer, Landscape officer, and Conservation officer are noted, it has been agreed with them that most the detailed concerns they have referred to in their submissions can be dealt with as part of any future application for the detailed design and layout of the buildings and the site. The Council would however also like to see any future application being submitted with a supporting Design Code document or similar, which clarifies the qualities of the materials, landscaping, and architectural detailing, and how they are complimentary to and would enhance the site and the general area.

As a result, as access is the only detailed matter at this stage, and other layout and design matters are reserved, it is considered that it is possible for such matters to be considered at the reserved matters stage should the Inspector approve the current outline consent.

### 9.3 Impact on Amenity

The site is located some distance from most residential properties in Tisbury, with the closest being to the north and west of the site across the railway line. Whilst the proposed development may well be visible from these dwellings (particularly those to the north adjacent the river bridge and footpath) and there may be some overlooking created from the proposed dwellings, it is considered that any relationship would be at a suitable distance, and the loss of privacy would not be so significant as to warrant refusal, particularly given existing mature planting and the railway line between the proposal site and the existing housing.

This industrial site is directly adjacent the Tisbury Railway station and railway line, and the applicants contamination survey confirms there may be contaminants in the site. The applicants noise and vibration survey concludes that:

*The Stage 1 assessment indicates a low to medium noise risk across the site. A vibration survey has been undertaken and vibration levels have been found to be acceptable for residential use. Noise sources affecting the site are trains, announcements from the train station, a substation and existing commercial uses.*

*Noise propagation across the site has been calculated using noise mapping software. Appropriate external and internal noise criteria have been considered to minimise adverse impacts on health and quality of life as a result of the new development. The majority of the site is subject to low noise levels and suitable for residential use with minimal mitigation.*

*However, some areas have higher noise exposure. Appropriate mitigation measures have been outlined which should be developed during detailed design, including building orientation, screening and thermal double-glazing and trickle vents. With appropriate mitigation, the proposed scheme is not expected to experience a significant adverse noise impact and the site is considered acceptable for the proposed residential use.*

The Council's Public Protection have advised that:

*There are multiple contaminants onsite that currently pose an unacceptable risk to human health. The development site is located adjacent to Tisbury railway station and the main line between Waterloo and Exeter. It is noted the final layout of the site and internal layout of the dwellings has not yet been finalised.*

*I have reviewed the Noise Assessment completed by Venta Acoustic dated July 2020 which identifies that mitigation is required to meet internal and external ambient noise levels. Mitigation is detailed at Section 8 of the*

*report. The proposed development scheme includes development of a Care Home. No details have been submitted in respect of building services plant that may be installed for the care home, or details about delivery schedules to and from that site, I have therefore recommended specific conditions below which relate to the care home.*

*Having appraised the application, I recommend conditions are applied to any approval of this application.*

In light of the response of the Council's public protection officer, the scheme would be acceptable subject to conditions. Thus the scheme could not have been refused on this basis in officers opinion. Conditions will be agreed between the parties at the future Inquiry.

#### 9.4 Highway safety/parking/linkages

Policy BL7 of TNP contains a number of criteria which relate to access works and pedestrian linkage, namely criteria 2,3 & 5. Policy 60 & 61 of the WCS also relate to highway issues and works.

The road system adjacent to the site and leading to and from it is relatively narrow and rural in nature. As described in the applicants Planning Statement, the site currently has a dual vehicular access onto Jobbers Lane, just south of the railway bridge where the lane crosses beneath the Waterloo to Exeter railway line. Jobbers Lane continues beneath the railway bridge, becoming Station Road at a sharp right- hand bend, and continuing past Tisbury Railway Station toward the High Street. The narrow footway continues beyond the railway bridge where it connects with a public footpath toward the village centre on Church Street, known locally as the Stubbles Path. There is no footway on either side of Station Road after this point.

The access for this development would be retained from Jobbers Lane. However, as referred to elsewhere in this report, the access/egress to the site suffers from flooding/drainage issues, particularly under and around the railway bridge. The application therefore proposes to close one of the three arches under the railway bridge and provide a raised pedestrian/cycle walkway above the level of any flooding. The following improvements to the site access and pedestrian/cycle access are listed by the applicant:

- To close the eastern bore of the railway bridge to vehicular traffic and create a widened pedestrian and cycle lane under the bridge.
- To widen the existing footways on Jobbers Lane/Station Road a standard suitable for a combined pedestrian/cycle shared space, between the site entrance and a point opposite the Stubbles Path.
- To raise the height of the footway and underbridge lane to create a safe means of access-based climate change flood scenarios.
- To provide a pedestrian crossing point as part of associated traffic management proposals set out below.
- The introduction of a section of single directional traffic movement between a controlled by traffic signals,
- The traffic signals to also include pedestrian phasing to allow pedestrians to cross from the site access to the footway on the east side of Jobbers Lane and vice versa.

- A 40-mph speed limit at a suitable point to the south of the site entrance along Jobbers Lane.

The applicants Statement also refers to the aspirations to have a bridge over the railway or a tunnel:

*Firstly, any improvements at Tisbury Station remain uncertain in terms of funding and timescales..., albeit that some technical work has taken place. Network Rail are supportive of the rail safeguarded area set out on the indicative layout plan for the development but have not specifically asked for any provision of bridges or tunnels. In addition, the Neighbourhood Plan Policy for the site does not specifically require provision of a footbridge or tunnel, rather requiring the safeguarding of land for rail improvements.*

*Secondly, in the absence of any pedestrian crossing of the railway via a footbridge or tunnel, the development should provide safe pedestrian, cycle and disabled access to the village and the station....., the existing highway and footway in Jobbers Lane/Station Road is inadequate and indeed dangerous for pedestrians and cyclists, and the limited footways too narrow for wheelchair users. There has been much local concern noted regarding vehicle speeds in Station Road/Jobbers Lane. It is important therefore that the development is supported by safe and appropriately designed pedestrian and cycle access to the rest of the village, particularly in the absence of any clear proposals for improvements at Tisbury Station.*

The applicants have submitted a Transport Assessment which concludes that:

*.....the results indicate that an increase of 45 additional vehicle trips are anticipated on the local road network during the AM Peak. This equates to less than 1 vehicle movement every 1 minute and is not considered to have any material impact on the existing road network in terms of highway capacity or highway safety. In accordance with Wiltshire Local Transport Plan – Car Parking Strategy, a total of 207 car parking spaces should be provided as part of the Proposed Development. Appropriate provisions for cycling has also been put forward in order to encourage local residents to cycle more. The Proposed Development will provide secure, covered and conveniently located cycle parking facilities for flats, visitors and the residential care home. It is envisaged that appropriate cycle storage will be feasible within private gardens for each of the houses within the Proposed Development.*

*It is concluded that the Proposed Development can provide safe and suitable access for all users. Travel to and from the Site has been carefully considered and the proposed layout has been designed to accommodate the needs of all users of the Site. Overall this Transport Assessment concludes that the Proposed Development can be safely and conveniently accessed by other, sustainable modes of transport.*

The Council's Highways officer has commented thus (extract):

*The Transport Assessment accompanying the application correctly indicates that existing provision for pedestrians and cyclists in the vicinity of the site is very poor.*



*Network Rail oppose any increase in use of the level crossing at the north of the site, and an existing footway on the opposite side of the proposed access (along Jobbers Lane) is less than 1m in width with no reasonable prospect of improvement and/or integration.*

*(Network Rail do not accept the applicant's statement that future residents would not have access to the existing Chantry pedestrian level crossing or public footpath at this northern end of the site, believing that any boundary treatment stands the chance of being breached especially considering that the crossing provides a more direct route to the town for most of the development.)*

*In order to compensate for an otherwise lack of suitable pedestrian/cycle access, the applicant proposes the closure of the southbound railway arch to vehicular traffic, to be replaced by the installation of a new elevated 3m wide pedestrian/cycle route at a height to coincide with flood thresholds. (I do not propose to comment on the flood levels quoted, but should the EA argue for a higher level, it may well compromise the minimum headroom required for such facilities.)*

*It would also seem obvious that such a structure would occupy a significant volume within the arch, thereby reducing the space that would otherwise be available for flood storage.*

*Were such a scheme to progress, it would require advertising and resolving to approve a Traffic Order that would secure closure of the section of the road in question to vehicular traffic – it would also rely on the Highway Authority being prepared to license the provision of such a structure over/on the public highway.*

*The TA indicates that the surface level of the proposed structure would be built at 91.3m AOD, some 0.6m above existing road level (quoted as 'approximately' 90.63m AOD)*

*Campbell Reith's drawing numbered 0002 P1 shows the distance between the surface of the proposed elevated structure and the underside of the bridge arch to be **3118mm**. The plated height of the bridge shows the height of the bridge arch above road surface level to be 10'3" (ie **3124mm**) ie virtually the same. It is not possible to reconcile the design drawing with the situation on the ground.*

*On the basis of those measurements, it is unclear whether such a structure would fit within the arch. The structure and railings would occupy most space within the arch, and would need to accord with DfT's Local Transport Note 1/20 which looks for clear headroom across the whole width of 2.4m. There is insufficient information to demonstrate whether those standards and requirements can be met.*

*There is also clear photographic evidence to show that there are existing services and drainage facilities within and across the road proposed for covering with the elevated structure, but no indication of the effect of the proposed works or how their provision could be safeguarded.*

*The nature of the elevated structure is such that any detritus that gathered below the structure would be extremely hard to remove.*

*The plan accompanying the Transport Assessment proposes that the elevated structure will be built using piling techniques. The TA gives no indication whether Network Rail have been approached to seek their view on whether such a procedure would be acceptable so close to this stone arched structure.*

*The TA indicates that the structure would be built using open mesh decking. That is not a material that would be accepted for adoption by the Highway Authority.*

*Closing one of the arches to traffic would result in all vehicles having to use the significantly narrower and lower (currently southbound) single arch. To facilitate such a proposal, the TA indicates the provision of a set of shuttle traffic signals, one set at each end of the closure (at the northern end, pedestrian crossing facilities are indicated). There is insufficient information to demonstrate whether there is sufficient space to accommodate signal poles and other associated infrastructure as well as sufficient road width noting the proximity of stop lines and potential queue lengths.*

*Alongside, the TA shows plans for significant kerb realignment at both ends of the closure indicating tight non-standard reverse curves, and on a map base that is not accurate to show whether it could be delivered within the red line of the application accurate and/or any other constraints.*

*In terms of the need for wider connectivity, the TA indicates that the proposed elevated structure would land at a point which would allow access into the town centre via footpaths TISB74 and WTIS14. I am advised however that these paths are also subject to flooding, nor suitable or permitted for cycling.*

*Even in the unlikely event that all of the above could be resolved, the proposed arrangements for pedestrians and cyclists to access would be lengthy and inconvenient.*

*Whilst land is shown as safeguarded within the site for the potential railway line dualling and second platform, I understand that Network Rail (and the rail industry in general) has no firm plan in place to undertake these works currently. These works were proposed in the West of England Line Study 2020 (part of NR's modular strategic planning) but the proposals are unfunded and at an early stage of business case development. It is thus unclear whether this safeguarded land would be sufficient for these purposes at this stage.*

## **Conclusion**

*Given the above, I see no way of being able to recommend a conditional approval.*

*The basic premise of closing a road open to all traffic and replacing it with an exclusive facility that has been put forward to do no more than improve the planning case for an individual planning proposal is in my view unacceptable.*

*I do not believe that the Council would be prepared to sponsor or support a corresponding Traffic Regulation Order, nor do I believe the Council would be prepared to enter a license for construction of the elevated structure.*

*Other proposed works including installation of traffic signals and kerb/road realignment are a) insufficiently detailed to show whether they can be delivered and b) shown to an unacceptable standard.*

*In detail, (bearing in mind that detailed approval for access is sought at this stage) there remains uncertainty over whether such a structure could be built to a suitable standard within the confines of the arch, or whether the practicalities of construction and ongoing maintenance can be dealt with. (in that context, I am doubtful whether Network Rail would agree to a piled structure, but I accept it is for them to be asked and to respond to.)*

*Notwithstanding the above, the overall approach to pedestrian/cycle connectivity is contrived, poorly conceived and fails to achieve an acceptable access arrangement for the site. It is noted that previous planning submissions (S/2002/1367 & S/2003/2547) on this site were refused by Salisbury District Council for broadly the same reason. These latest proposals are not considered to have overcome these issues.*

*In conclusion, I would currently recommend the application be refused.....*

## **Summary**

The proposed walkway would result in the loss of part of the public highway, and result in highway issues to the operation of that part of the highway. As outlined elsewhere, there also appear to be flooding/drainage issues raised by this structure. Notwithstanding, once users of the walkway join the existing Station Road, there is then no additional highway improvements into Tisbury centre. Together with the closure of the existing railway line footpath to future residents, this means that sustainable access to the services and facilities of Tisbury centre would not be readily available or prioritised, particular at times of flooding events.

It is therefore considered that the proposal would not be in accordance with aims and objectives of policy BL7 of the Tisbury Neighbourhood Plan, and would also not accord with the aims of the transport and highways policies of the Wiltshire Core Strategy, or the NPPF.

## **9.5 Impact on railway station and line and infrastructure**

Point 2 of policy BL7 of TNP indicates that any development proposal should:

2. Liaise with Network Rail (and other parties as required) to identify and safeguard land to meet their current and future operational requirements including appropriate access and parking provision for the southern side of the line.

Policy TR2 of the TNP also indicates that:

Development at or within the environs of the Tisbury Railway Station that protects and enhances the existing railway service will be supported. To ensure the necessary co-ordination, proposals should be developed in conjunction with the Local Planning Authority, Network Rail and other interested parties as appropriate. Proposals should have appropriate regard for the following:

1. Increasing and accommodating the use of public transport - train, bus and taxi.
2. Accommodating sustainable travel needs, such as pedestrian accesses, bicycle shelters and electric car charging points.
3. Extending car parking in line with the levels of station usage.
4. The requirements of the Tisbury Conservation Area and the Victorian character of the station buildings

The applicants Planning Statement explains the situation (extract):

*Network Rail, in late 2020, published a technical study on various improvements to the West of England line along its length from London Waterloo to Exeter St Davids. The report, "Continuous Modular Strategic Planning – West of England Line Strategic Planning" makes a number of recommendations in respect of dualling the line at Tisbury and associated station improvements:*

#### **8.1.1 Description**

***This intervention is an extension of the current Tisbury Loop westward through Tisbury to enable a 5.5km loop with an additional platform at Tisbury station. This is required for performance/ resilience, capacity and journey time savings on SWR services.***

#### **8.1.2 Overview**

***Land would need to be acquired on the Down side to accommodate the new platform. There could be an opportunity to extend the existing platform and the proposed new platform at Tisbury to accommodate six-car services. This has not been considered in this study but would form part of any future scheme development.***

*Additionally, a new footbridge will be required to connect the new platform on the Down side of Tisbury station with the existing Platform 1 on the Up side .....to be Access for All (AfA) compliant, the footbridge would be required to have either compliant ramps and/or lifts. Lifts are likely to be the preferred option at this station location and further development will be required to understand whether this can be achieved safely at this location or whether additional land on the up side may be required owing to the width of the platform.*

*Whilst details exist of what these improvements could be, there is as yet no information on what funding exists for them, or in what timescale the improvements are programmed to take place. It is clear that the works do not form part of any specific transport or planning policy, nor, as far as the applicant is aware, are they defined in any Network Rail infrastructure programme.*

*The indicative layout for Station Works ..includes an area of approximately 0.4 hectares immediately adjoining the railway line and station which is to be left undeveloped and safeguarded for future improvements to the station and line. Given the lack of detail on the timescale for any these proposals, it is considered that this safeguarding represents a reasonable and proportionate obligation on behalf of the applicant to future rail infrastructure provision, and which, from the technical study undertaken by Network Rail in 2020, appears more than adequate to accommodate the improvements suggested.*

*Subsequent discussions have taken place with Network Rail which have confirmed that it considers the safeguarded area adequate to allow for any future improvements at Tisbury.*

Network Rail has stated the following (summary extract):

*Whilst in principle NR are supportive of the proposal and welcome the safeguarded land to facilitate future improvements to Tisbury railway station, some concern remains regarding the potential risk of accessing Chantry pedestrian level crossing and the parking management of the development.*

#### *Chantry pedestrian level crossing*

*We note that the applicant states future residents would not have access to the existing Chantry pedestrian level crossing or public footpath at this northern end of the site, however, Network Rail's Level Crossing team remain concerned that if the boundary treatment is not adequate it may be breached.*

*As part of our license to operate and manage Britain's railway infrastructure, we have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable.*

*The most effective way to mitigate any additional risk to the pedestrian level crossing would be to close the level crossing by diverting the Public Right of Way (PROW) TISB16 either over a new footbridge or through the development and along the new shared pedestrian / cycle way, however, this is unlikely to be feasible given the length of the diversion required to rejoin PROW TISB15.*

*As a result, we request a number of conditions are attached to any planning to address our concerns of increased use and consequently increased risk to the Chantry pedestrian level crossing and the future residents.*

- 1. A prior to commencement condition which details how the pedestrian level crossing will be inaccessible from the development during the construction phase. This could be included within a 'Construction Management Plan'.***

2. ***A prior to commencement condition that provides Network Rail with the opportunity to review and agree the boundary treatments post construction.***
3. ***A prior to occupation condition ensuring that the agreed boundary treatment is installed.***
4. ***A prior to occupation condition requiring a 'Boundary Treatment Management Plan' that ensures the boundary treatment is regularly monitored and if breached, repaired within a certain timeframe.***

## Summary

From the Network Rail response, it appears that provided any application is approved with conditions restricting access by future occupiers of the scheme to the adjacent footpath crossing the railway line, and provided that parking on the proposal site is adequately managed, then Network Rail would not object. This response also suggests that additional railway parking is not considered to be required as part of any proposal. Therefore the aims of criterion 2 of policy BL7 are met in the sense that Network Rail seem satisfied with the current outline proposals, and does not appear to be asking for any additional parking or for a suitable access to the site.

However, it is unclear how the railway protection area would be treated in the short to medium term prior to the land being required. The indicative layout plan is unclear but suggests that land would not be accessible, but the artists impressions supplied suggest the land would be utilised as a pathway serving the development. It is also not clear how this land would be accessed should this land be needed in future for the railway or how this may impact on the general amenities of development. These would need to be sorted out at the reserved matters stage.

### 9.6 Access to adjacent Rights of Way system including railway line crossing.

Currently, the public footpath runs across the adjacent railway line to the north of the railway station and through the northern section of the existing site.

As Network Rail objects to occupiers of this proposed scheme using the adjacent footpath system which runs across the main railway line adjacent the site (see below), the Council's rights of way officer has withdrawn her initial objection (to new residents not having access to the footpath network) subject to a financial contribution to the footpath system in the immediate area of the site, as below:

*Our preferred solution would be access to TISB16, the off-site contribution would overcome our objection. The £7,250 would cover the costs of the following improvements that have been identified for paths that would see increased use if the link to TISB16 is not provided:*

*Re-surface the first section of TISB74 with tarmac (1.5m width) for approximately 50m from the Station Road end. Improve the surface of WTIS13 with stone (1.2m width) for approx. 153m long split over 2 sections ) and 50m of wooden edging on side of the path.*

As a consequence, even though it is considered to be a regressive step in planning and overall design terms to stop future residents accessing the right of way system, a refusal of the application on this basis may be difficult to justify, unless Members feel that that the enhancement of the existing footpath system is outweighed by the

benefit of retaining the footpath link with the application site. Such access however would of course be contrary to wishes of Network rail as outlined below.

### 9.7 Archaeology

The Council's Archaeologist has commented thus:

*The Archaeology Service has previously been consulted about this proposal and we have previously been in receipt of the archaeological desk-based assessment report (Cotswold Archaeology, September 2020) submitted with the current application. The assessment report has established the potential of the site to contain buried remains of prehistoric and Roman date and notes in particular the discovery of a stone-coffined Roman inhumation found in 1953 just to the east of the red line boundary of the site. Unfortunately, further details of this discovery are unknown.*

*The assessment report also notes that the site is likely to have been substantially disturbed from several phases of previous development, along with substantial terracing into the north-west facing natural slope. This is corroborated by the geotechnical data that shows deep 'made ground' deposits in some parts of the site. However, the report notes that there may be areas of the site where buried remains may have survived, undisturbed by previous uses of the site. The area within the red line boundary that is likely to be the least disturbed, and therefore has the highest archaeological potential, is the green space along the east side of the site, but this is not proposed for any development. On this basis, the report concludes that further archaeological investigation would be appropriate if the application was permitted, and this could be secured by an appropriately worded condition.*

*In view of the previous history of the site and the existing buildings on site and provided the green space in the east of the site is not proposed for development, I agree with the conclusion of the archaeological desk-based assessment report and that archaeological investigation would best await demolition to ground level of the existing buildings. The archaeological investigation should initially take the form of an exploratory trial trench evaluation which will determine if there are any areas of archaeological interest within the site that will be impacted by the proposed development. The results of the exploratory investigation will, if justified, be used to develop an archaeological mitigation strategy, which may include further archaeological investigation prior to the commencement of development in areas of archaeological interest or monitoring during construction work. The archaeological mitigation strategy should be prepared and agreed prior to the approval of any reserved matters applications in relation to this outline application.*

*The following condition is proposed:*

*No development, other than demolition to ground level, shall commence within the area indicated by application PL/2021/09778 until:*

- a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved in writing by the Local Planning Authority; and*
- b) The approved programme of archaeological work has been carried out in accordance with the approved details.*

*REASON: To enable the recording of any matters of archaeological interest.*

*The programme of archaeological work should comprise the following elements:*

*i) Exploratory archaeological investigation through trial trenching after demolition but prior to the commencement of development*

*ii) The archaeological investigation of any areas of archaeological interest identified by the exploratory investigation. This may comprise further investigation prior to the commencement of development in the areas of archaeological interest or monitoring during development.*

*iii) A programme of assessment, analysis, and publication commensurate with the significance of the archaeological results.*

As a result, there are no archaeology issues with the development, subject to conditions being imposed.

### 9.7 Ecological Impact/River Avon Catchment Area

Point 4 of Policy BL.7 stipulates: *'The estimated capacity of the site is 60 dwellings in two storey buildings plus commercial uses, but density overall must be appropriate for the edge of a rural settlement in an AONB with the potential to impact on the Conservation Area and two Special Areas of Conservation (SAC) (the River Avon SAC and the Chilmark Quarries SAC).'*

Point 11 of Policy BL.7 states: *'All necessary species and habitat surveys must be carried out to determine the extent to which the development would affect the bat species that are features of the Chilmark Quarries SAC and appropriate measures taken to avoid and mitigate impacts to roosts, foraging and commuting habitats.'*

Policies CP50 and CP52 relate to ecology matters and biodiversity/green infrastructure and are also relevant, as well as CP69 related to the protection of the River Avon SAC.

The application is accompanied by an ecological survey. This concludes that:

- A construction environmental management plan should be developed to mitigate any construction impacts on the River Nadder;
- A financial contribution should be made (through S106 obligation or CIL) toward implementation of the River Avon Phosphate Management Plan;
- Replacement hedgerow planting to be provided for any lost as part of bat mitigation;
- A landscape and environmental management plan to be developed to ensure the vegetated bank, together with any new landscaped areas, and the attenuation pond are managed for wildlife in the long term;
- The Himalayan Cotoneaster on the railway embankment where it encroaches on the site should be removed;
- Specific mitigation proposals for foraging badgers, birds, barn owls, bats and reptiles to be incorporated into the development.

A Habitats Regulations Assessment was then provided by the applicant. The assessment specifically considered the impact of the proposed development at Station Works on the Chilmark Quarries SAC and the River Nadder, which is a tributary of the River Avon SAC. The HRA screening considered that likely significant effects could not be ruled out in the absence of mitigation for River Avon SAC phosphate pollution and recreational impacts and

for Chilmark Quarries loss or fragmentation of functional habitat (both physical loss and via light disturbance impacts).

The applicants HRA recommended the following mitigation:

- Extensive habitat creation for bats leading to a net increase in available foraging/commuting habitat;
- Lighting design with light spill reduction methods to ensure continued use of bat foraging/commuting habitats; and
- Phosphate neutral development via CIL payments as set out in the Wiltshire Local Plan.
- The Habitats Regulations Assessment Information Report concludes that the Local Planning Authority should be able to safely conclude that an Appropriate Assessment of the proposed development under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) can be passed.

This information has been reviewed by the Council's Ecology team. They objected subject to the carrying out of a positive Habitats Regulations Assessment, and subject to the following matters being addressed by the applicant:

- Provision of currently omitted 'net gain assessment' report cited in the EclA. The completed Biodiversity Metric should also be provided in its entirety. Provision of two scaled and detailed plans; the first should clearly illustrate and quantify the existing habitat; and the second plan should illustrate and quantify the areas of habitat to be retained as well as areas of proposed habitat / habitat to be enhanced.

#### Extent of proposals

- Provision of revised *Sketch Site Layout* showing full extent of current proposals including the proposed steps and footpath up the bank in the south-eastern section of the site and an area of POS at the top of the bank as these proposals are referred to in the EclA but not shown on the submitted plans. The areas that these proposals would cover should also be quantified and provided.
- Soft landscaping for bats proposed in the EclA comprising planting of hedgerows on the bank and new tree planting at the base of the bank are not shown on the *Sketch Site Layout – 06 Rail Safeguard* (Drawing no. SKL-06).
- Proposed swales are not suitably annotated/shown in the key of the *Sketch Site Layout*.
- The *Sketch Site Layout* should be revised to show full extent of proposals and to demonstrate that recommendations set out in the EclA will be implemented. There should also be consistency across the submitted plans. This is needed in interests of proper planning and to facilitate fully informed assessment of effects on protected species including bats, reptiles and birds

#### Ecology survey

- Clarification regarding the date that the update Phase 1 Habitat Survey was undertaken.
- Confirmation regarding whether the validity of the ecological survey data was reviewed as most of the data was over 2 years old at the time the application and EclA was submitted, and the EclA stipulates the data is only valid for 18 months. The Council generally considers survey data to be valid for 2 years and applications should be supported by valid data particularly where the data informs HRA as is the case for this application. Therefore, a rationale setting out why the data was still considered valid and why update surveys were not conducted must be provided as this is not included within the EclA. If a sound rationale cannot be provided surveys would need to be updated.



## Reptiles

- It is considered that the minimum number of trapping days proposed for the reptile translocation is too low and not in accordance with best practice. A rationale is required for the proposed approach (e.g. is it due to the size of the area to be excluded). The strategy should be revised if a sound justification cannot be provided

## Ecological Parameters Plan

- Revised EPP requested which shows and quantifies all ecological, landscape and arboricultural parameters and consideration should be given to the incorporation of an ecological buffer between the bank in the southeast of the site and the development/works footprint. This should be shown on the plan.

## Phosphate issues

- Provision of bespoke phosphorus mitigation strategy, which has been discussed with NE through their DAS, for the 'unplanned' uplift in proposed development at the site from that which was allocated in the NDP.

## Chilmark Quarries SAC

- Provision of currently omitted lighting report cited as in the EclA as: 'Alan Tulla Lighting (2021). *Lighting design for car parks at Tisbury Station, Wilts.*'
- Requested revision to scheme layout to incorporate further avoidance and mitigation measures for bats, including ecological buffer zone / 'dark corridor' between identified bat flight lines used by Annex II qualifying species of the SAC and the development/works footprint.

It has been some months since the Council's ecologist expressed her initial views. The applicant has suggested that they would provide further information to address the above, but at the time of writing, nothing has been received. However, the applicants viability assessment received just before this report was finalised suggests that they may wish to offer a Nutrient Reduction Agreement contribution of £237,379. No further information regards this contribution has yet been forthcoming, but in principal, the Council's ecology officer considers that such a contribution would be useful in phosphate mitigation. However, such a contribution can only be secured if and once the appellant submits a suitable legal agreement which is agreed as part of the appeal decision.

The Council's ecologist has now indicated that in the period since their initial comments, the Council's own work on providing a solution to the phosphate issue has progressed, and given the [Ministerial Statement](#) on 20 July 2022 measures are coming forward to help minimise nutrient burdens of development through wastewater treatment works improvements and a Natural England led strategic mitigation scheme. Some of these measures are being secured through other legislation in due course. This will hopefully lift the significant burden on Local Authorities.

Regards the other issues raised above related to the various reports, it remains the fact that the submitted details are somewhat contradictory. However, should the Inspector be minded to approve this scheme, the Council's ecologist is now of the view that suitable conditions could be imposed to ensure that the suggested mitigation works occur as suggested.

Based on the above, and subject to suitable phosphate mitigation, and suitable conditions, including in relation to the Chilmark Quarries SAC, and subject to finalisation of the proposed national measures to ease the phosphorus issue in due course, it is considered that the proposal would accord with aims and objectives of policy BL7 (point 4 and 11) of the Tisbury Neighbourhood Plan, and the aims of Core Policy 50 and 52 of the Wiltshire Core Strategy, and the biodiversity aims of the NPPF.

Because of the likely significant effects on the River Avon SAC and the Chilmark Quarry SAC, a positive Habitats Regulations Assessment will however need to be concluded by the Inspector.

## 9.8 Drainage and Flooding

Whilst the site itself is located in Flood Zone 1, the adjacent highways access via Jobbers Lane around the railway bridge/arches area and the adjacent field system to the north is in Flood Zone 2 & 3, and has a recent history of flooding issues. Third Parties have highlighted this matter in the various responses. This is an issue for the scheme as the highway system beneath the railway bridge (Flood Zone 3) would be the only way that any future occupiers of the proposal would be able to access Tisbury and its facilities, given that access to the existing footpath system would not be allowed.

Policy CP67 of Wiltshire Core Strategy relates to developments in Flood Zones 2 & 3. Policy HNA 3 of the Tisbury NP and its supporting text relates to flooding issues in Tisbury and around the application site.

The Environment Agency has currently concluded that (extract and summary):

### *Flood Risk*

### *Flood Zone Compatibility*

*..The proposed walkway should be classified as a water-compatible use. If the Local Planning Authority (LPA) are satisfied with this classification, then the proposed walkway will need to:*

- remain operational and safe for users in times of flood;*
- result in no net loss of floodplain storage;*
- not impede water flows and not increase flood risk elsewhere.*

*We understand that designing the walkway to remain operational may be impractical and therefore measures will need to be put in place to make it safe; this along with the other points are discussed further below.*

### *Safe Access*

*It is the LPA's responsibility to decide if the access arrangements are safe and they should determine this through consultation with their emergency planners. The EA's role is to provide technical advice regarding the flood hazard rating, which should be provided in the Flood Risk Assessment (FRA).*

*In this instance, all of the proposed buildings will be located in Flood Zone 1, but the access is via Jobbers Lane which is located in Flood Zone 3. Therefore, if residents or the emergency services needed to access the site during the design flood they would need to pass through floodwater.*

*The assessment of hazard for vehicular access uses flood levels that differ to those stated in the FRA. The letter estimates a flood level of 91.70mAOD for the 1% annual probability event plus 38% climate change allowance, whilst the FRA states in paragraph 5.1.6 a flood level of 92.38mAOD, which is significantly higher. Clarification on the design flood level is required before an assessment of the hazard for the vehicular access can be concluded.*

*We note that the letter states "safety would be controlled by individual users because the extent of any flooding would be immediately apparent". Whilst the extent of flooding will be clear to see, the depth of flooding may not be immediately apparent and, therefore, it may be advisable to provide some indication of this to users.*

### *Increase in Flood Risk Elsewhere*

*The letter provides a high-level assessment of the potential impact of the raised walkway based on the loss of floodplain storage volume. However, the potential reduction in conveyance through the bridge arches is more of a concern. The restriction on flow caused by the bridge means that changes in conveyance through this structure have the potential to have a significant effect on flood risk elsewhere.*

*Whilst the letter appears to try and address the concern qualitatively, this is not sufficient to overcome our concern. We request that hydraulic modelling is undertaken to assess the impact of the proposals and any*

potential compensation. Alternatively, the design of the proposed walkway could be altered to avoid reducing conveyance and loss of storage. Measures would need to be installed to appropriately manage the risk to users and the LPA's emergency planners should be consulted on any such proposals.

#### *Other matters*

Our comments provided in our previous letter dated the 12 November 2021 relating to groundwater and contaminated land are still relevant to this application. (Officer note - These state as below:)

#### *Groundwater and Contaminated Land*

The investigation reported in the Environmental Risk Assessment (Ridge, November 2020) has identified hydrocarbon contamination of soils and shallow groundwater beneath the northern end of the site. This part of the site is in close proximity and up gradient of the River Nadder and we therefore agree with the conclusions of the report that there is the potential for unacceptable levels of pollution of controlled waters.

The nature of the hydrogeological pathway between the identified contamination and the River Nadder is not described explicitly in the report; we consider that further refinement of this part of the site conceptual model could aid the design of the proposed permeable reactive barrier and assessment of residual risk following remediation.

A remediation options appraisal and strategy has been presented in the Remediation Method Statement (Ridge, August 2021). Bioremediation is stated as being the preferred option for dealing with soil and groundwater contamination in section 9.2 though the table of remedial actions in section 9.14 states remediation is to be achieved through treatment using clay stabilisation. We have no objection to either method in principle although it must be ensured that the treatment design takes account of site specific conditions to achieve optimum performance.

Remediation target criteria for soils and groundwater should be defined prior to commencement of remedial works to ensure a defined end-point is known and to reduce the risk of delays during the verification process. In the absence of derived site-specific target concentrations, the conservative Environmental Quality Standards (or Drinking Water Standards where no EQS available) should be used.

An Environmental Permit is likely to be required to regulate the proposed remediation of soils and groundwater unless the conditions of RPS 215 for small scale remediation schemes can be met in full. Further details are available at Land contamination pilot trials and small scale remediation schemes: RPS 215 - [GOV.UK](https://www.gov.uk) ([www.gov.uk](https://www.gov.uk)).

We note that re-use of excavated materials is proposed as part of the development. Any such re-use should be carried out in accordance with an appropriate regulatory regime such as an Environmental Permit or declaration under the CL:AIRE Definition of Waste Code of Practice. We recommend early application for any permit that may be required for remediation activities or re-use of materials since determination can take a number of months.

We recommend the following conditions are included in any planning permission granted (if our flood risk objection can be overcome) to ensure the risks from the identified contamination are dealt with appropriately. Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not contribute to, be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution...

In addition, if our objection in relation to flood risk matters could be overcome, we would wish a condition for a Construction Environmental Management Plan to be included in any granted planning permission for the site. This condition would be required to ensure there would no pollution of the environment during the construction phase of the scheme. We can provide suggested wording for this condition in due course.

The Council's Drainage team in their capacity as Lead Local Flood Authority have the below objections to the application; and have stated that these must be overcome before a drainage objection can be removed:

1. *The drainage team mirror the concerns laid out by the Environment Agency (in their consultation response dated 18<sup>th</sup> August 2022), with regards to Flood Zone Compatibility, Safe Access, Increasing flood risk elsewhere and groundwater and contaminated land. For brevity, these objections have not been repeated as part of our response.*
2. *The applicant is proposing construction in Jobbers Lane (outside of the catchment boundary). The footpath / cycleway will impact on how surface water is drained which has not been addressed in the proposed drainage strategy (Appendix H of the Flood Risk Assessment and Drainage Strategy); the LLFA also question whether a legal agreement is in place for construction within this area, and discharge of surface water to third party assets. Furthermore, as the proposed footpath / cycleway will impact on levels within Flood Zone 3, additional compensatory storage (on 3rd party land) will likely be required, and will need to be agreed with the EA.*
3. *The proposed drainage strategy includes an existing manhole within what appears to be easement for the railway line. The location of this should be revised due to potential for a clash with any track-dualling that might occur in the future. Furthermore, detailed drawings are required of the connectivity between the SW line, flow control and attenuation pond.*

Whilst not objecting to the proposals, Wessex Water have also indicated that:

*There is a 1" water supply main with the site boundary at the south west end of the site. In accordance with Wessex Water Policy, there must be no habitable buildings within a minimum of 3m either side of the distribution main and no tree planting within a minimum of 6m. This includes no surface water attenuation features and associated earthworks in the easement strip. The water main must not run through enclosed private rear gardens, it must be within a 6m (3m either side) open access easement strip or roads. Wessex Water require unrestricted access to maintain and repair our apparatus. The proposed layout (shown on drawing ref SKL-06 Rev P9 dated 21/05/20) appears to conflict with this existing main, however as this is an outline application, we would not object at this time, the applicant will need to either consider diverting the main or changing the proposed layout to accommodate the required easements for the main.*

## Summary

It is clear from a recent events and from the Tisbury NP that the highway and field systems around the site have a history of flooding issues. The applicants would therefore have been fully aware of this issue prior to submission of an application from its consultation process. However, at the time of writing, this matter has not yet been resolved to the satisfaction of the Environment Agency or the Council's Drainage officers. Thus, at the time of writing, the proposals do not address the flooding and drainage issues associated with the accessing of the site and hence how suitable linkage between the site and the facilities and services in Tisbury can be achieved. The proposal is therefore contrary to the aims of policy BL7 (criterion 3 & 5), and HNA 3 of the Tisbury NP, and also the aims of policy CP67 of the WCS, and the NPPF guidance related to flooding matters.

## 9.9 Viability and affordable housing provision

Points 1 & 6 of policy BL7 relate to contamination issues, viability, and affordable housing provision.

The applicants have indicated via a recently revised viability assessment that the development will be unable to provide the required 30 percent stated within policy BL7 and CP43 of the WCS. The Council's own viability adviser has currently indicated to the contrary, that the proposal subject of this application is viable enough to provide 30 percent affordable housing as well as the other suggested S106 contributions/requirements elsewhere in this report. As stated elsewhere in this report, it is however the case that an "alternative" scheme which could provide some industrial units on the site has also found to be unviable in that it too would be unable to provide policy compliant affordable housing.

At the time of writing, the assessment of the applicants viability report has yet to be concluded. Thus at the moment, whilst point 1 above has been complied with, point 6 of the policy BL7 regards the provision of

affordable housing has not been complied with. The Council Housing Officer has requested 30 percent affordable housing, and this remains the position until the outcome of the viability assessment is known.

The proposal is therefore currently in policy terms contrary to the aims of point 6 of BL7, and to the aims of CP43.

**S106 mitigation matters**

The Wiltshire Planning Obligations Supplementary Planning Document (SPD) (Adopted May 2015) supports Core Policy 3 and provides further detail on the council’s approach to developer contributions

- Provision of affordable housing on site**

The applicants have submitted an affordable housing viability statement that indicates that in its view, a policy compliant amount of affordable housing cannot be provided on this site. The viability assessment process related to this matter is ongoing at the time of writing. Subject to that being resolved, the Council’s affordable housing officer response remains as follows:

*Policy Requirements:*

*I note that an Affordable Housing Viability Statement was submitted with the application and that subsequently, the Viability Review Report demonstrates that the scheme is viable with provision of the full policy requirement. My comments therefore are provided on this basis.*

*Core Policy 43 of the Wiltshire Core Strategy (as amended by the National Planning Policy Framework) sets out a requirement for 30% on-site Affordable Housing provision within the 30% Housing Zone, on all sites of 10 or more dwellings. There is therefore a requirement to provide 26 affordable units within a scheme of 86 dwellings. This would meet the policy requirement and would assist in addressing the need for affordable housing in Tisbury.*

*With respect to the care home proposals, the development of a care home does not require provision of an affordable housing contribution. However, if the scheme includes provision of any self-contained retirement apartments to be sold or let on the open market, this aspect of the scheme would require an affordable housing contribution of 30% on-site affordable housing in accordance with Core Policy 46 and Core Policy 43 of the Wiltshire Core Strategy.*

*Tenure Mix:*

*In accordance with Core Policies 43 and 45 of the Wiltshire Core Strategy the tenure mix should reflect local need for affordable housing and should therefore be provided with a tenure mix of 60% of the units (16 units) being for Affordable Rented housing, and 40% of the units (10 units) being provided for shared ownership.*

*Unit Size Mix:*

*Core Policy 45 of the Wiltshire Core Strategy states that housing size and type will be expected to reflect that of the demonstrable need for the community within which a site is located. There is currently a need for all sizes of affordable accommodation in Tisbury. The following mix is currently suggested by the applicant as the mix that would be provided, should provision of the full policy requirement be considered viable:*

<b>Affordable Rent</b>	<b>Shared Ownership</b>
------------------------	-------------------------

2 x 1 bed flats 2 x 2 bed flats 10 x 2 bed houses 2 x 3 bed houses	7 x 2 bed flats 3 x 3 bed houses
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*There is a predominance of 2 bed provision within this proposed mix. If it could be achieved without impact on viability, a slight amendment would provide the following preferable mix which would better reflect demonstrable need:*

*Affordable Rented:*

*4 units - 1 bed / 2 person (maisonette style) flat or bungalow*

*8 units - 2 bed / 4 person house or bungalow*

*4 x 3 bed / 5 person house*

*Shared Ownership:*

*7 units - 2 bed / 4 person house*

*3 units - 3 bed / 5 person house*

*There is also a demonstrable need for adapted housing in Tisbury. On all schemes which provide more than 10 Affordable Housing units, it is requested that 10% of affordable units are provided as adapted units in order to help meet this need. These units should be provided as ground floor flats / bungalows to Building Regulations M4(2) standards with a level access shower provided. In this instance it would be appropriate to provide the ground floor flats as adapted units to meet demonstrable need.*

*Design of Scheme (including Minimum Floorspace Standards):*

*Affordable housing in Wiltshire is expected to meet high standards of design and quality, and to be visually indistinguishable from open market housing. I note that the layout provided is indicative and does not show the location of the Affordable Housing units. In designing the final scheme, the following should be taken into account:*

- The Affordable Housing units should be evenly dispersed, in small clusters of no more than 15 units, within mixed tenure developments.*
- Any 1 bedroom flats should be provided in small blocks. Please note that 2 bedroom flats above ground floor level, and flats over commercial units or garages, are considered unsuitable for affordable units.*
- Parking courts are not considered suitable for affordable homes (other than for blocks of flats). Parking for houses should be provided in curtilage or adjacent to the property.*

*In order to ensure that the affordable housing units are eligible for inclusion in Homes England's Affordable Housing programme, we would advise that all affordable homes are built to meet at least 85% of the Nationally Described Space Standard (NDSS) relevant to the dwelling type and minimum person criteria. NDSS and 85% NDSS are shown in the table below:*

Number of bedrooms	Number of bed spaces	NDSS			Minimum 85% NDSS		
		1 storey (sqm)	2 storey (sqm)	3 storey (sqm)	1 storey (sqm)	2 storey (sqm)	3 storey (sqm)
Studio	1p	39 (37)*			34 (32)*		
1b	2p	50	58		43	50	
2b	3p	61	70		52	60	
	4p	70	79		60	68	
3b	4p	74	84	90	63	72	77
	5p	86	93	99	74	80	85
	6p	95	102	108	81	87	92

\*Where a one person flat has a shower room rather than a bathroom the floorspace may be reduced from 39 sqm to 37 sqm (NDSS) or from 34 sqm to 32 sqm (85% NDSS).

#### *Transfer to Registered Provider:*

*The affordable dwellings will be required to be transferred to a Registered Provider, approved by the Council, or to the Council, on a nil subsidy basis.*

*It is strongly recommended that the applicant makes contact with Registered Providers and Wiltshire Council's Residential Development Team as soon as possible in order to discuss the best option for the affordable dwellings including an indication of transfer prices that can be expected. A list of Registered Providers who work in partnership with Wiltshire Council can be provided on request.*

#### *Nominations:*

*The Local Authority would have nomination rights to the affordable dwellings, secured through a S106 Agreement.*

At the current time, subject to the outcome of the ongoing viability assessment process, it is considered that the scheme is viable enough to provide the required level of affordable housing provision referred to above.

#### • **Provision of waste and recycling facilities**

The Council's Waste officer has confirmed that recycling facilities are required under policy CP3 and WCS6. He has requested the following contribution:

The Council requests s106 contributions towards the provision of waste and recycling containers for each residential unit, under policies CP3 and WCS6. The following estimated contribution is required for the proposed development:

Property type category	Contribution per house/per category	Quantity	Total
Individual house	£91	69	£6279
Bin store for block of 6-10 flats	£581	0	£ 0
Bin store for block of 11-14 flats	£1,038	0	£0
Bin store for block of 15-18 flats	£1,474	1	£1474
<b>Total</b>			<b>£7753</b>

Please note that all arrangements for the Care Home and associated treatment centres are classed as commercial and Wiltshire Council do not have an obligation to collect from these properties.

- **Provision and maintenance of public open space on and off site**

The Council's open space officer has confirmed that:

*The dwelling mix stated in the design and access statement generates a requirement of 1455m<sup>2</sup> of public open space and 873m<sup>2</sup> of equipped play.*

*A public open space has been included within the development, please note that we cannot accept attenuation basins as POS unless the area remains dry and useable for a substantial amount of the year, please do not include in the area calculation if it does not meet this requirement. All on-site open space provision must be secured in perpetuity. Wiltshire Council will not adopt the POS.*

*An off-site contribution of £125,712.00 is required for equipped play.*

*An off-site Youth and Adult contribution of £52,380.00 is required.*

*The target site for this contribution is the Lower Recreation Ground and/or playing pitch and ancillary services within the facility of the development. The Lower Recreation Ground next to the development which has a range of facilities in need of upgrading, including the pavilions which host the sports, social club and bowls club alongside the playing pitches. The Lower Recreation Ground also has a play area in need of upgrading/developing so this would be a target site for equipped play alongside upgrading play provision at the field by the Nadder centre.*

*Closing the level crossing would mean the formal play area would not be accessible and I would say it needs to be looked at from a view of keeping and upgrading from a safety perspective if there is an issue here. Closing the crossing is of concern and takes a link away from the development.*

*Retirement Home:*



*The open space requirement for 30-40 care home would fall between 609.93m<sup>2</sup> - 813.24m<sup>2</sup> - the final figure is to be calculated once the exact dwelling number is finalised. If the provision cannot be met on site then an off-site contribution will be required using £34.87m<sup>2</sup> to make up any shortfall. All on-site open space provision must be secured in perpetuity. Wiltshire Council will not adopt the POS.*

*There is no requirement for Equipped Play or Youth and Adult facilities to be provided for the care home development.*

The appellant has confirmed the following:

Dwelling	Rate	Number	Total requirement
1-Bedroom	10m2	2	20m2
2-Bedroom	15m2	52	780m2
3-bedroom	20m2	29	580m2
4+-bedroom	25m2	3	75m2
Care Home	8m2	40 max	320m2

*This gives a total requirement of 1,455m2 for the residential development, and 320m2 for the care home. The provision within the indicative scheme is in excess of both requirements.*

As a result, as the area of open space shown on the outline plan exceeds 320 sqm, it is considered that any future legal agreement should simply contain a requirement that any care home should have an open space area adjacent and available to it for its residents of at least the equivalent of 8sqm per occupant. This is in line with saved policy R3 of the SDLP, which specifies that 0.81hecatres of open space be available per 1000 population, which equates to 8sqm per person).

- **Public Art**

The Council's open space team has also confirmed the contribution below for public art. This is based on the required contribution of £300 per dwelling, and is supported by saved policy D8 (of the Salisbury District Local Plan), and policies CP3, CP57 of the Wiltshire Core Strategy, and the Planning Obligations DPD.

The Public Arts provision for this development is required as an off-site contribution of £25,800.00.

- **Provision of financial contribution towards off site Education facilities**

The applicants have submitted an Education Impact Assessment which concludes that there is surplus places in the catchment area and hence the application does not need to provide any financial contribution towards educational facilities.

The Council's Education officer maintains her view that a contribution is required as below:

*We note that among the documentation submitted by the applicant there is an Education Impact Assessment, which attempts to rebut the S106s cases that were advised to them at the pre-app stage. However, the assessment includes primary schools which aren't within 2 miles safe walking distance of the development site, and as such are not appropriate destinations for the pupils who will live on it. The Council would be obliged to provide transport for them, which is not sustainable, and would incur significant and ongoing costs which the Council is unable to meet. The only appropriate primary school designated to serve this development, is St John's CE, Tisbury.*

PRIMARY ASSESSMENT DETAILS:

- Capacity = 140 places.
- Oct 21 number on roll = 123 pupils.
- Highest numbers forecast = 127 pupils.
- Additional places required in housing already registered/approved but not yet built out = 4.
- So, the school currently has 9 spare places available.

PRIMARY S106 CONTRIBUTION REQUIREMENTS: Current primary cost multiplier = £18,758 per place: \*(Please refer to accompanying caveats as the cost multiplier quoted is due to be updated shortly for the 2021/22 year).

- There is limited capacity currently available at St John's CE, and it is insufficient to accommodate the full pupil product of this proposed development. There are no other primaries within 2 miles safe walking distance of the development site.
- As a result, we require a developer contribution towards the 25 - 9 (available places) = 16 places that this development generates a need for at St John's CE Primary, Tisbury. Using the current cost multiplier, (but please see note \* above) = 16 places x £18,758 = £300,128. This contribution would be subject to indexation and secured by an S106 agreement to which the Council's standard terms will apply.

- **Rights of Way enhancement**

As Network Rail objects to occupiers of this proposed scheme using the adjacent footpath system (which runs across the main railway line adjacent the site), the Council's rights of way officer has requested a financial contribution to the footpath system in the immediate area of the site, as below:

*Our preferred solution would be access to TISB16, the off-site contribution would overcome our objection. The £7,250 would cover the costs of the following improvements that have been identified for paths that would see increased use if the link to TISB16 is not provided:*

*Re-surface the first section of TISB74 with tarmac (1.5m width) for approximately 50m from the Station Road end. Improve the surface of WTIS13 with stone (1.2m width) for approx. 153m long split over 2 sections ) and 50m of wooden edging on side of the path.*

- **Phosphate mitigation**

Explanation of the phosphate issue and justification for this contribution is provided for in the ecology section of this report. Core Policy CP69 applies.

The applicants viability assessment suggests that they may wish to offer a Nutrient Reduction Agreement contribution £237,379.

## **10. Conclusion and planning balance**

The comments of the Town Council and other third parties and consultees have been taken into account.

The site has been recently included within the settlement boundary of Tisbury, within which, residential development is considered acceptable in principle. The site is also allocated for development within the adopted Tisbury Neighbourhood Plan. As the Council does not currently have a 5 year housing land supply at the current time, the development of the site for housing is considered to be of significant weight, particularly in terms of the provision of much needed housing, including any affordable housing. However, as stated elsewhere, it is considered that due to flooding issue related to this site, the “tilted balance” towards approving the development does not apply in this instance.

Whilst the proposal does not accord with the aims of policy BL7 in terms of providing industrial type employment on the site, the proposed care home would provide a local facility and would provide employment. This should also carry weight. Similarly, whilst the number of dwellings proposed is above that suggested by the allocation policy, such figures are not regarded as a ceiling figure, and no harm has been identified in relation to the additional housing over and above the number referred to in the policy, particularly as it will make a modest contribution to housing land supply. Whilst the suggested layout and design of the scheme could be improved upon, it is considered that this can be dealt with via any future reserved matters application.

However, there remains an objection from the Council’s Highways department, the Environment Agency and WC Drainage. The Council must therefore conclude that there remains a significant highway, flooding and drainage issue related to this application in terms of the access and egress of the site, including how occupiers of the site would access services and facilities in the adjacent town during a flooding event. The Council’s Highways officer has objected to the access works. This significantly weighs against the proposal.

Furthermore, at the present time, the applicants viability assessment process is still ongoing, and the applicant has also indicated that they would not wish to provide the required educational contribution. In the absence of a suitable legal agreement, the proposal would therefore not be able to contribute any suitable mitigation towards off site educational facilities, onsite affordable housing, the management or enhancement of on or off site open space facilities, on site waste and recycling facilities, the enhancement of highways access infrastructure, off site rights of way, or public art provision. The suggested contribution towards nutrient mitigation cannot be achieved. This is considered to be of significant weight.

Consequently, as the applicant has now appealed and the Council need to conclude its consideration of the application as the decision making body, the proposal is considered to not accord with the aims and objectives of the adopted Tisbury Neighbourhood Plan in particular policy BL1, BL2 BL3 BL7, HNA1, & HNA3 It would also fail to accord with the sustainable development aims of the NPPF and the Wiltshire Core Strategy, including saved policy R2 & policies CP1,CP2, CP3, CP27, CP35, CP43, CP46, CP50, CP51, CP52, CP57, CP61, CP67, CP69. As a result, based on the existing proposals and justification, the harm caused by the proposal is likely to significantly outweigh any positive benefits provided by the provision of housing on the site.

**11. RECOMMENDATION: THAT THE PROPOSAL WOULD HAVE BEEN REFUSED, for the following reasons:**

1.The proposal envisages the closing off of one of the existing vehicular routes under the existing railway bridge, and the construction of a raised pedestrian and cycle structure. In terms of several critical aspects, the application does not contain sufficient information to allow proper consideration of the proposals. Notwithstanding the lack of detail, the principles of access for pedestrians and cyclists is unacceptable. The route proposed is unattractive and circuitous, and is conditional on the road being close to vehicular traffic and the implications thereof, which is an unacceptable proposition.

Consequently, it has not been demonstrated that an acceptable and safe means of access for non-motorised users can be achieved to the site. Furthermore, insufficient information has been provided to demonstrate that the proposed pedestrian/cycle route meets the requirements set out within the Department of Transport's Local Transport Note 1/20 and Disability Discrimination Act 1995, and that the proposed signals can be accommodated within the existing highway.

As a result, the proposal is considered to be contrary to Tisbury Neighbourhood Plan policies BL3 (2), BL7 (3), Wiltshire Core Policies 60, 61 & 62 and NPPF Section 9, paras 104-106 & 110-112.

2.Notwithstanding the highway access issues, the highway and field systems around the site have a history of flooding issues. The proposal envisages the access via Jobbers Lane which is located in Flood Zone 3. Therefore, if residents or the emergency services needed to access the site during the design flood they would need to pass through floodwater, during a flood event. The proposed walkway access will need to remain operational and safe for users in times of flood; result in no net loss of floodplain storage; not impede water flows, and not increase flood risk elsewhere.

However, this matter has not yet been resolved, and the proposals do not address the flooding/drainage issues associated with the accessing of the site and hence how suitable linkage between the site and the facilities and services in Tisbury can be achieved. The proposal is therefore contrary to the aims of policy BL7 (criterion 3 & 5), and HNA 3 of the Tisbury Neighbourhood Plan, and also the aims of policy CP67 of the Wiltshire Core Strategy, and the NPPF guidance related to flooding matters.

3.Furthermore, at the present time, the viability assessment of the application remains ongoing. The applicants assessment is currently indicating that a policy compliant percentage of affordable housing cannot be provided on site. Until this viability process is completed, the Council assume that the proposal can provide the required quantum of

affordable housing required by policy. Notwithstanding, the applicant has also indicated that they would not wish to provide the required contribution towards mitigating the impact of the scheme on existing educational infrastructure. Consequently, and in the absence of a suitable legal agreement, the proposal would therefore not be able to contribute suitable mitigation towards off site educational facilities; onsite affordable housing; the management or enhancement of on or off site open space facilities, on site waste and recycling facilities, the enhancement of highways access infrastructure, off site rights of way, public art provision, or any contribution towards nitrate mitigation.

As a result, the proposal is contrary to the aims of CP3, CP43, CP50, CP52, CP57, CP69 of the Wiltshire Core Strategy, the Council's Planning Obligations DPD, saved policies R2, D8 , the waste and recycling core strategy policy WCS6, and the aims of policy BL1, BL2, and BL7 criterion 6 in relation to the quantum of affordable housing.



### Shaftesbury residential home Castle Hill House is closing before Christmas and will be 'mothballed.'

Trustees of local charity Cedars Castle Hill say recruiting staff has become increasingly difficult since covid, and when Brexit ended the free movement of workers from abroad. And prices have increased significantly. "Year-on-year costs, compared with September of 2021, have increased by about 15%. Food is part of that. Energy costs potentially add a terrific burden for small operators like ourselves," says trustee Mike Hall.







Castle Hill residents will be moved to the Cedars Nursing Home on Angel Lane, which will be adapted. This news comes as the remaining four residents of another local independently run trust, Pepperrell House, have been given a formal leaving date notice of 18th December, following the initial closure announcement made in the summer.

Listen to our interview about Castle Hill with Mike.

Click below to listen.







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About Th






# 'End Of The Line' For Pepperell House Sa Chair

27TH JULY 2022 / COMMUNITY, POLITICS






THE ALFRED DAILY


The Alfred Daily – 27th July 2022


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
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**North Dorset’s MP has met with trustees of Pepperell House, the sheltered accommodation on Bleke Street that is facing closure.**

Simon Hoare has been unable to find a solution to the financial and occupancy issues faced by the not-for-profit organisation. He says people with relatives living at Pepperell need to take action if they haven’t yet. “Pepperell House is going to close at some point in September, so they will need to be looking for alternative accommodation over the coming weeks,” he told Alfred.

In June, chair of trustees Barbara Yoxall appealed on Alfred Radio for help to save the home. Rising food and utility costs, low occupancy and a substantial roofing bill mean reserves have been depleted. She says that the accommodation, formerly known as Abbeyfield, is no longer viable. Barbara says there has been little in the way of help offered since her appeal. One potential trustee wanted her to step aside, but Barbara says there are regulations and procedures to adhere to and she has a ‘duty of care’ to residents. She says there would need to be a smooth transition to a new board of trustees.





Barbara Yoxall

After a two-and-a-half-hour meeting with existing trustees, MP Simon Hoare says the unique nature of Pepperell House makes finding a solution difficult. It isn't a care home. None of the five staff is on duty after 7pm. Instead, trustees voluntarily respond to out-of-hours incidents or call outs. Barbara says it's a huge commitment, and she's not convinced it would be fitting to appoint trustees with relatives living there, as suggested. She fears they would lose interest when their relative died or moved elsewhere.

In our audio interview, Barbara addresses the criticism that vacant rooms have not been widely advertised. Since the closure announcement, occupancy has fallen further to seven residents. Barbara says she's been subject to unkind comments on social media which suggest she hasn't put the residents' interests first.

MP Simon Hoare supports the trustees' efforts. "The fundamental question is 'have the trustees erred in anything which they have done?' and, to the best of my knowledge, they haven't," Simon told Alfred.

A representative of a group formed to try to save the house felt she didn't wish to comment further when Alfred made contact with her yesterday. So, unless an entire potential board of trustees, with a route to additional finance, approaches Pepperell House in the next few days, closure in September appears inevitable.

Barbara and the trustees are now discussing plans for the disposal of the property. She says all proceeds from the sale of the building must be donated to a charitable cause with similar aims to Pepperell.

Click below to listen.





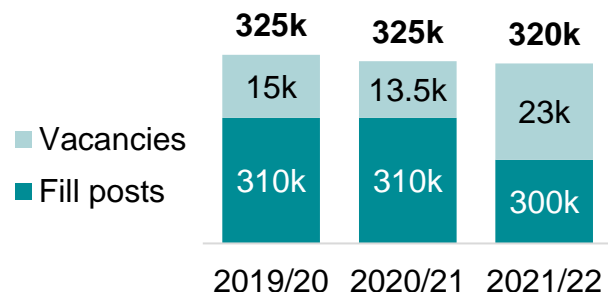
Source: Skills for Care adult social care workforce estimates 2020/21

### Recent trends – Workforce supply and demand

The number of filled posts across the whole adult social care sector decreased from 1.67 million in 2020/21 to 1.62 million in 2021/22. A decrease of around 50,000 filled posts, and the first decrease since records began in 2012/13. During the same period, the number of vacant posts increased by around 55,000. Therefore, the total number of posts in the sector is around the same (up 0.3%), but far more posts are now vacant.

Between 2020/21 and 2021/22, care homes without nursing saw a decrease of around 13,000 filled posts and an increase of around 9,400 vacant posts (a 70% increase). The total number of posts decreased from 325,000 to 320,000.

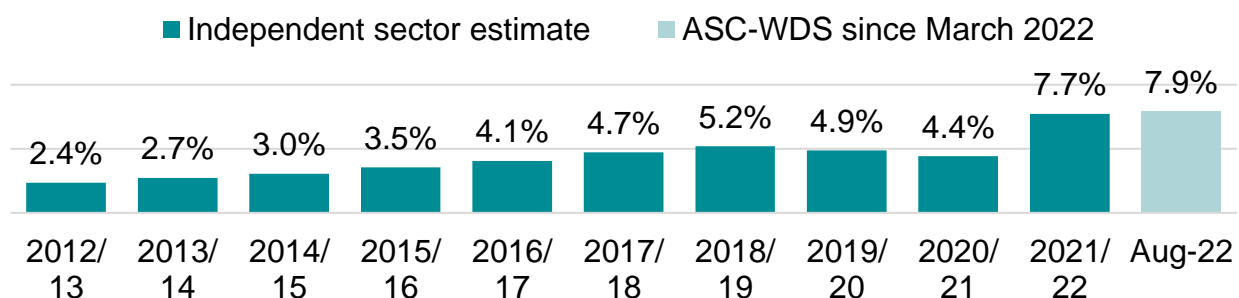
Estimated total posts



Since 2012/13, the number of care homes without nursing has decreased by around 1,700 (-14%), and the total number of beds has decreased by around 3,500 (-2%).

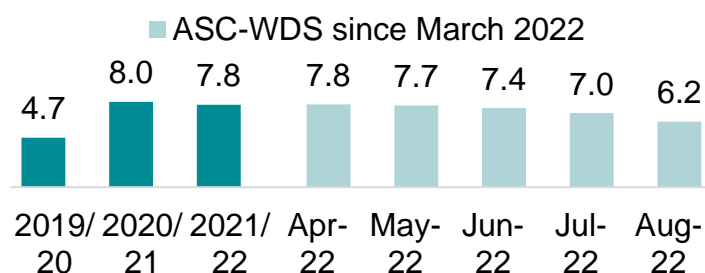
The vacancy rate consistently increased each year from 2.4% in 2012/13 to 5.2% in 2018/19, but decreased to 4.4% in 2020/21 during the start of the COVID-19 pandemic. However, the vacancy rate is now higher than at any point since records began in 2012/13.

### Vacancy rate trend from 2012/13 to August 2022



Levels of staff sickness nearly doubled during the COVID-19 pandemic, increasing from 4.7 days over 12 months in 2019/20 to 7.8 days in 2021/22. However, data from the ASC-WDS has shown that staff sickness has been decreasing since March 2022.

### Average sickness days over 12 months, 2019/20 to August 2022



## Key findings

**300,000**

Filled posts in care homes without nursing

**10,750**

Care providing locations across England

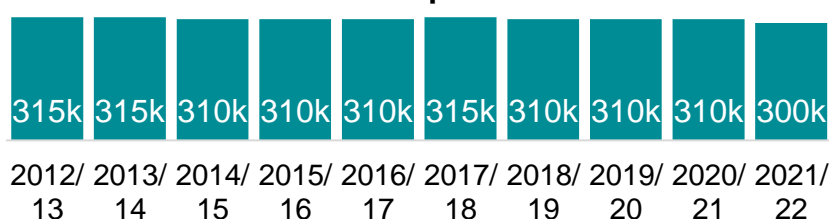
**28.2%**

Turnover rate in the previous 12 months

This report provides a summary of the adult social care workforce within care homes without nursing and includes Skills for Care's workforce estimates. Across England there were around 10,750 care homes without nursing registered with CQC as at 2021/22. These care providing locations had an estimated workforce of 300,000 posts. Around 285,000 of these roles were within the independent sector, with 14,500 in local authorities.

The chart below shows that the number of filled posts in care homes without nursing remained relatively stable between 2012/13 and 2020/21, before decreasing by 4% between 2020/21 and 2021/22.

**Estimated number of filled posts**



The estimated number of locations providing care home services without nursing decreased by 14% over the same period and

the total number of beds decreased by 2%. Therefore, although there are fewer locations, the overall capacity of this service across England is relatively the same.

## Staffing overview

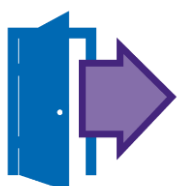


There were an estimated 216,000 direct care providing filled posts in care homes without nursing, 26,000 managerial filled posts, 550 regulated professionals and 56,000 other filled posts including ancillary non-care providing roles.

**Over half** of staff in care homes without nursing were employed on a full-time basis (54%) and 46% employed part-time.

Around 8% of the workforce were employed on zero-hours contracts and this proportion has been relatively stable since 2012/13. Across the whole adult social care sector, 24% of the workforce were employed on zero-hours contracts.

## Recruitment and retention



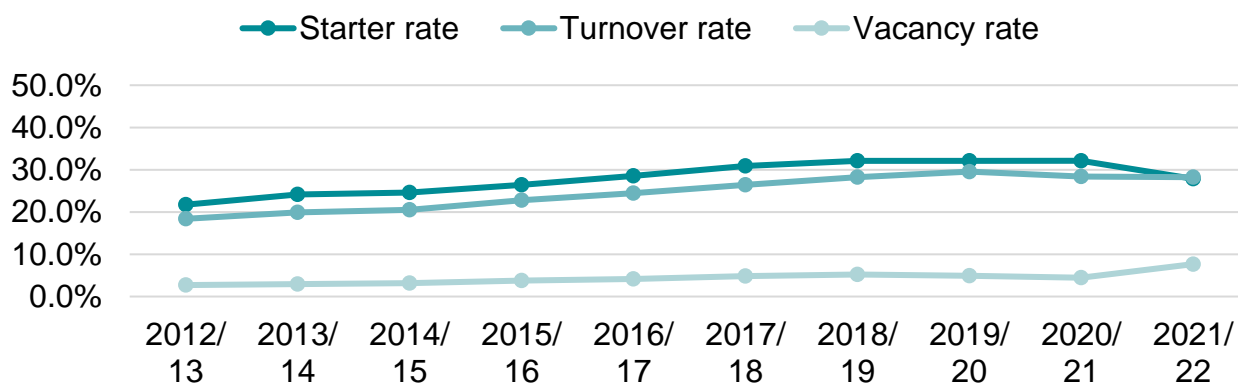
The turnover rate for care homes without nursing was 28.2%, which was lower than care homes with nursing (39.4%). This equates to an estimated 78,000 workers leaving their role in the previous 12 months. Care workers had a turnover rate of 34.6%, which equates to an estimated 56,000 leavers.

The turnover rate had been increasing between 2012/13 and 2019/20, but the starter rate was also increasing, which replenished the workforce. This pattern changed after 2019/20, as the turnover rate remained stable, but the starter rate decreased into 2021/22.

Please note that the turnover rate only includes locations which were active in March during each period, and leavers from locations that closed down are not included, therefore the total number of leavers may be higher.

The vacancy rate increased sharply in 2021/22, as filled posts decreased, therefore the demand for people to work in the sector is relatively similar to the previous year, but many more posts are now vacant.

### Comparison of starter, turnover and vacancy rate trend from 2012/13 to 2021/22



Care workers had one of the highest turnover rates at 34.6% in 2021/22, equivalent to around 56,000 leavers in the previous 12 months. The number of filled care worker posts decreased from 189,000 in 2020/21 to 180,000 in 2021/22 (a decrease of 4.5%).

Most of the workforce were recruited from within adult social care (67%). This means that although the high turnover rate results in employers going through the recruitment process, with its associated costs, the skills and experience of many workers are retained by the sector.

The workforce had an average of 9.8 years of experience working in social care. This was similar to the average for workers from care homes with nursing (9.6 years) but higher than the average for domiciliary care services (8.2 years).

The average length of time in current role was 5.3 years, which was higher than the average of those working in care homes with nursing (4.8 years). This would suggest that workers in nursing homes change roles within the sector more frequently than those in care homes without nursing.

### Demographics



Around 84% of workers in care homes without nursing were female, and the average worker was 44 years old. These demographic breakdowns broadly match those seen in the rest of the adult social care workforce.

The nationality of the workforce in care homes without nursing was 85% British, 6% EU (non-British) and 8% non-EU. This was similar to the diversity across all services (84% British, 7% EU (non-British) and 9% non-EU). Care workers at care homes without nursing had a slightly higher proportion of workers identified as non-British (7% EU; 10% non-EU).

The proportion of workers at care homes without nursing that identified as of an EU nationality has increased from 4% in 2012/13 to 6% in 2020/21. The proportion identified as of a non-EU nationality decreased over the same period from 10% in 2012/13 to 8% in 2021/22.

## Pay

The chart below shows the mean hourly pay trend of care workers at care homes without nursing in the independent sector, in both nominal and real-term amounts.

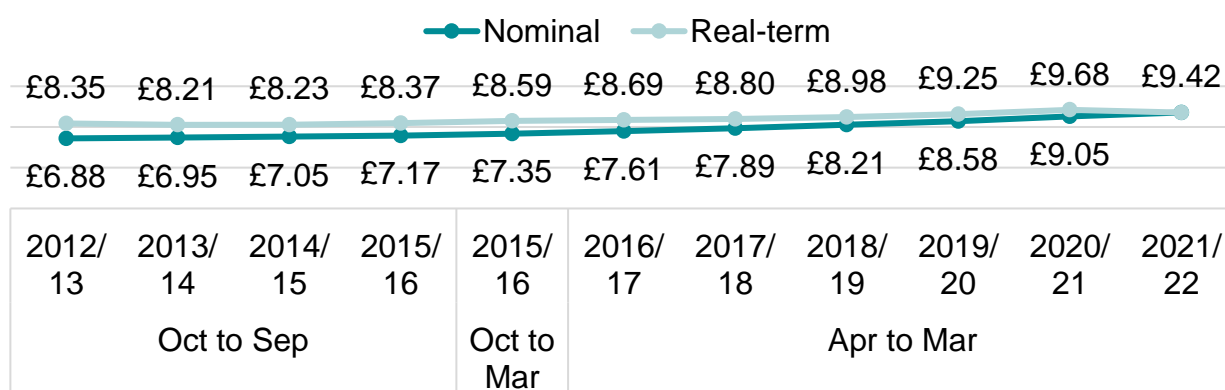
Nominal pay rates are not adjusted for inflation and present the rates as they were in each year. 'Real terms' means that pay rates have been adjusted to take inflation into account and have been calculated using the Consumers Price Index (CPI) (the official measure of inflation of consumer prices in the UK) and expressed in prices as at March 2022.

As an example, a worker's wage may have increased by 2% in a year. However, if inflation also rises by 2% then the worker will be no better off as a result of the pay rise; the nominal pay rise was 2%, but in real terms, the 'rise' would have been zero.

The mean nominal hourly rate of care workers has increased every year from £6.88 in 2012/13 to £9.42 in 2021/22, an increase of 37% over the whole period.

Their real-term pay also increased almost every year up to 2020/21, therefore the nominal increases were usually above the change in inflation. However, their real-term pay then decreased by 2.7% between 2020/21 and 2021/22, which highlights the increased cost of living during this period when inflation increased prices by 7%. Between 2012/13 and 2021/22, the real-term pay of care workers increased from £8.37 to £9.42, an increase of 13%.

### Nominal and real-term care worker mean hourly rate from 2012/13 to 2021/22



### Further information

For more information about the adult social care sector and workforce in England please see [www.skillsforcare.org.uk/stateof](http://www.skillsforcare.org.uk/stateof).

For bespoke analysis of workforce information or to answer any specific questions you have about the adult social care workforce please contact us using the email below.

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Data and analysis from Census 2021

# Care homes and estimating the self-funding population, England: 2021 to 2022

An estimation of the size of the self-funding population in care homes in England.

Provides data covering the period 1 March 2021 to 28 February 2022, broken down by geographic variables and care home characteristics.

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Contact:

Sarah Barrett

Release date:

30 May 2022

Next release:

To be announced

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2. Overview
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## 1. Main points

- From 1 March 2021 to 28 February 2022, there were an estimated 360,792 care home residents in England, which is a 7.9% reduction from before the coronavirus (COVID-19) pandemic (2019 to 2020; 391,927); of these, 34.9% (125,954) were self-funders, which is a 12.4% drop compared with pre-coronavirus pandemic (143,774; 36.7% of the total).
- The South East had the highest proportion of self-funders in care homes (44.1%), which is statistically significantly higher than the North East, which had the lowest (21.5%).
- Care homes located in the least deprived areas had a statistically significantly higher proportion of self-funders (52.5%) than care homes in the most deprived areas (18.7%).
- Smaller care homes, with 1 to 19 beds, had the lowest proportion of self-funders (12.5%), which is statistically significantly lower than all other care home sizes.
- Care homes providing care for older people had the highest proportion of self-funders (47.1%), which was statistically significantly higher than all other care home types; care homes for younger adults had the lowest proportion of self-funders (1.9%).
- The coverage of the care home population has improved in this release (68.6%) compared with the previous release (39.1%); statistical comparisons between years cannot be made because of differing response rates from care homes in each year.



## 2. Overview

Last year, we developed a [new experimental method to understand the size of the self-funding population in care homes](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology) (<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>), in England. We have used the same method to produce estimates for the period 1 March 2021 to 28 February 2022 (inclusive). This article contains data from the adult social care (ASC) [provider information returns](https://www.cqc.org.uk/guidance-providers/adult-social-care/provider-information-return-pir-adult-social-care-services) (<https://www.cqc.org.uk/guidance-providers/adult-social-care/provider-information-return-pir-adult-social-care-services>) (PIR) for residential services (care homes with or without nursing), which are collected by the Care Quality Commission (CQC).

The data have been weighted up to an annual estimate for England because of incomplete coverage of the care home population (68.6% after data cleaning); however this coverage is an improvement compared with our previous release, [Care homes and estimating the self-funding population, England: 2019 to 2020](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2019to2020)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2019to2020>), (39.1%).

Please see the [Glossary](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary>).

for the definition of "self-funder" used in this publication, which is based on the guidance provided to care homes from the CQC when distributing a PIR.

We will make comparisons to the period before the coronavirus (COVID-19) pandemic (August 2019 to February 2020) where relevant, however we cannot make statistical comparisons because of differing response rates from care homes in each year. For the full breakdown of pre-coronavirus pandemic estimates, please see our previous release.

New for this release are:

- Section 7, Care homes for working age adults  
(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#care-homes-for-working-age-adults>).
- provider size  
(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#comparing-the-proportion-of-self-funders-by-care-home-characteristics>), which has been calculated differently in the current release to account for whether the provider is part of a brand
- care home rating  
(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#comparing-the-proportion-of-self-funders-by-care-home-characteristics>), which now includes a No rating category

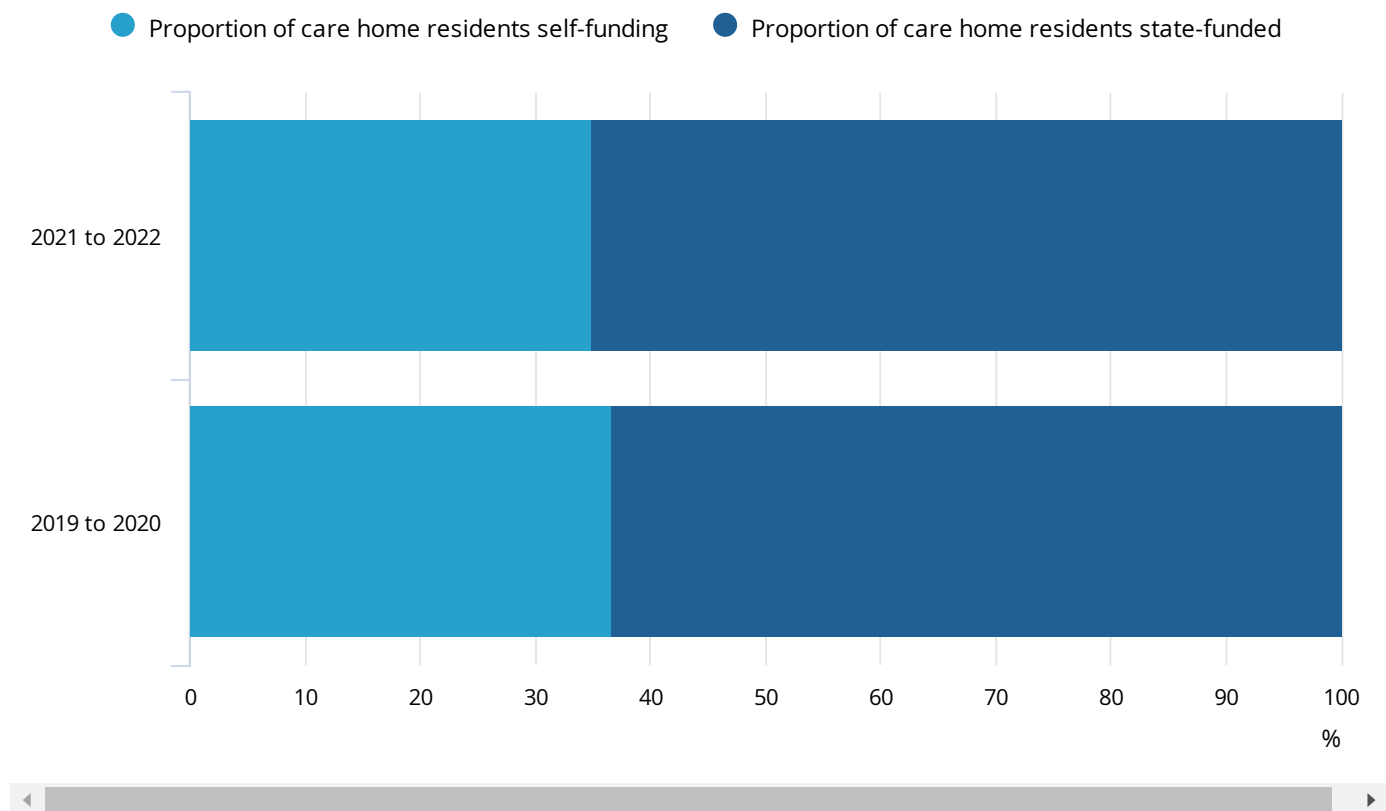
### 3. Self-funding population of care home residents

There were an estimated 360,792 care home residents from 1 March 2021 to 28 February 2022, occupying 77.8% of care home beds. Approximately 125,954 (34.9%) of care home residents were classified as self-funders, compared with 234,838 (65.1%) state-funded residents. This is similar to the proportion of self- and state-funded care home residents seen before the coronavirus (COVID-19) pandemic

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2019to2020>), although the overall care home resident population and occupancy has decreased.

## Figure 1: The proportion of self-funding care home residents is similar to before the coronavirus (COVID-19) pandemic

Total care home resident population by the proportion of self- and state-funded care home residents, England, 2019 to 2020 and 2021 to 2022



**Source:** Care Quality Commission - Provider information returns, Office for National Statistics

### Notes:

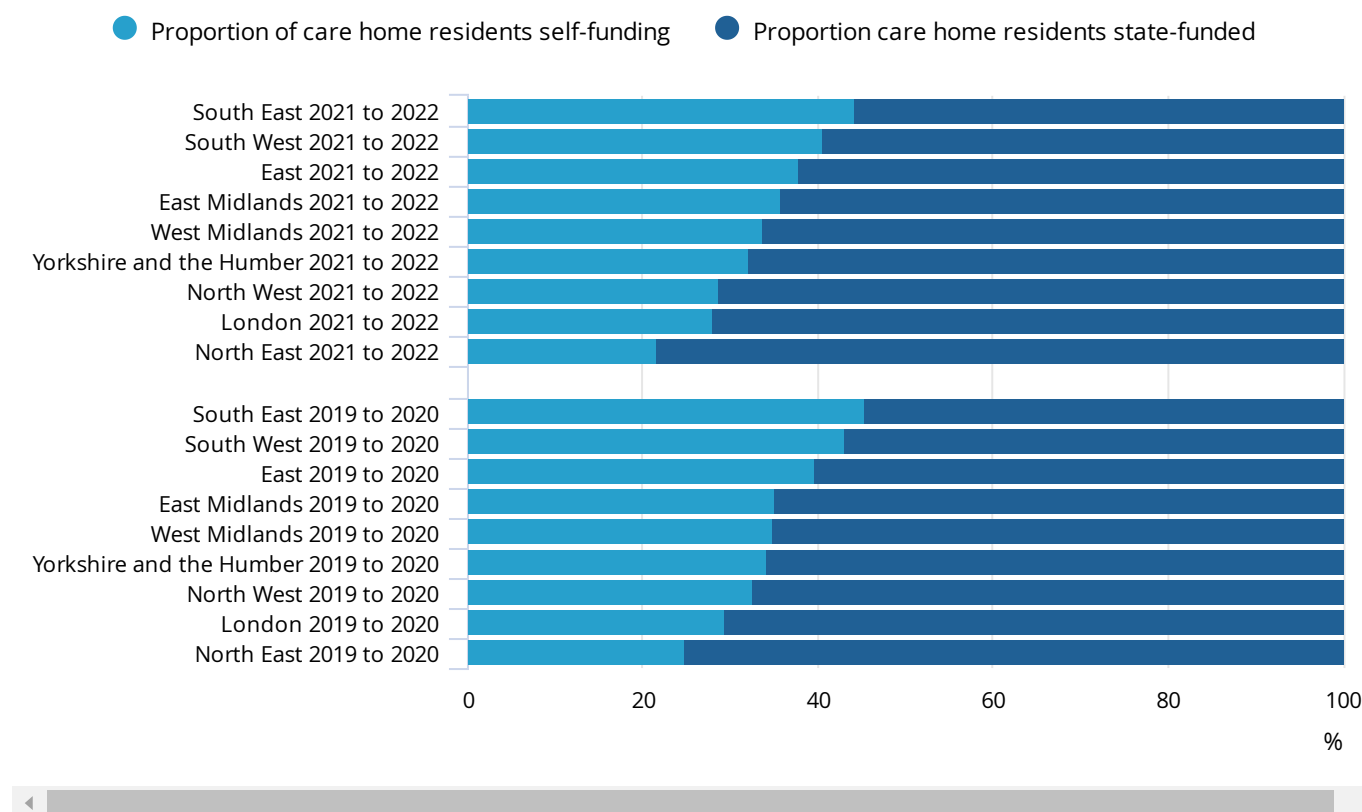
1. Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 August 2019 and 29 February 2020, and 1 March 2021 and 28 February 2022.

## 4. Geographic breakdown of self-funders in care homes

The South East remained the region with the highest proportion of self-funders (44.1%) and the North East remained the lowest (21.5%), which is a statistically significant difference. The overall pattern was the same as pre-coronavirus (COVID-19) pandemic (Figure 2). Regional differences may occur as the value of an individual's property can be considered in the financial assessment for the funding of care, and average property value varies by region. When averaging data from the UK House Price Index published by HM Land Registry (<https://www.gov.uk/government/collections/uk-house-price-index-reports>), from March 2021 to February 2022, the region with the highest average house price was London (£508,801). This was followed by the South East (£361,213), and the lowest average house price was in the North East (£146,860).

## Figure 2: The proportion of self-funders was highest in care homes in the South East

### Regions by the proportion of self- and state-funded care home residents, England, 2019 to 2020 and 2021 to 2022



**Source: Care Quality Commission - Provider information returns, Office for National Statistics**

#### Notes:

1. Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between August 2019 and 29 February 2020, and 1 March 2021 and 28 February 2022.
2. Region is based on where the care home is located as identified in the latest [National Statistics Postcode Lookup File \(https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-february-2022/about\)](https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-february-2022/about) at the time of data analysis (August 2021 and February 2022).

Excluding local authorities (LAs) that have been suppressed as part of disclosure control, the highest proportion of self-funders is in Sevenoaks (71.7%) in the South East. The lowest proportion of self-funders is in Halton (6.8%) in the North West. This is a statistically

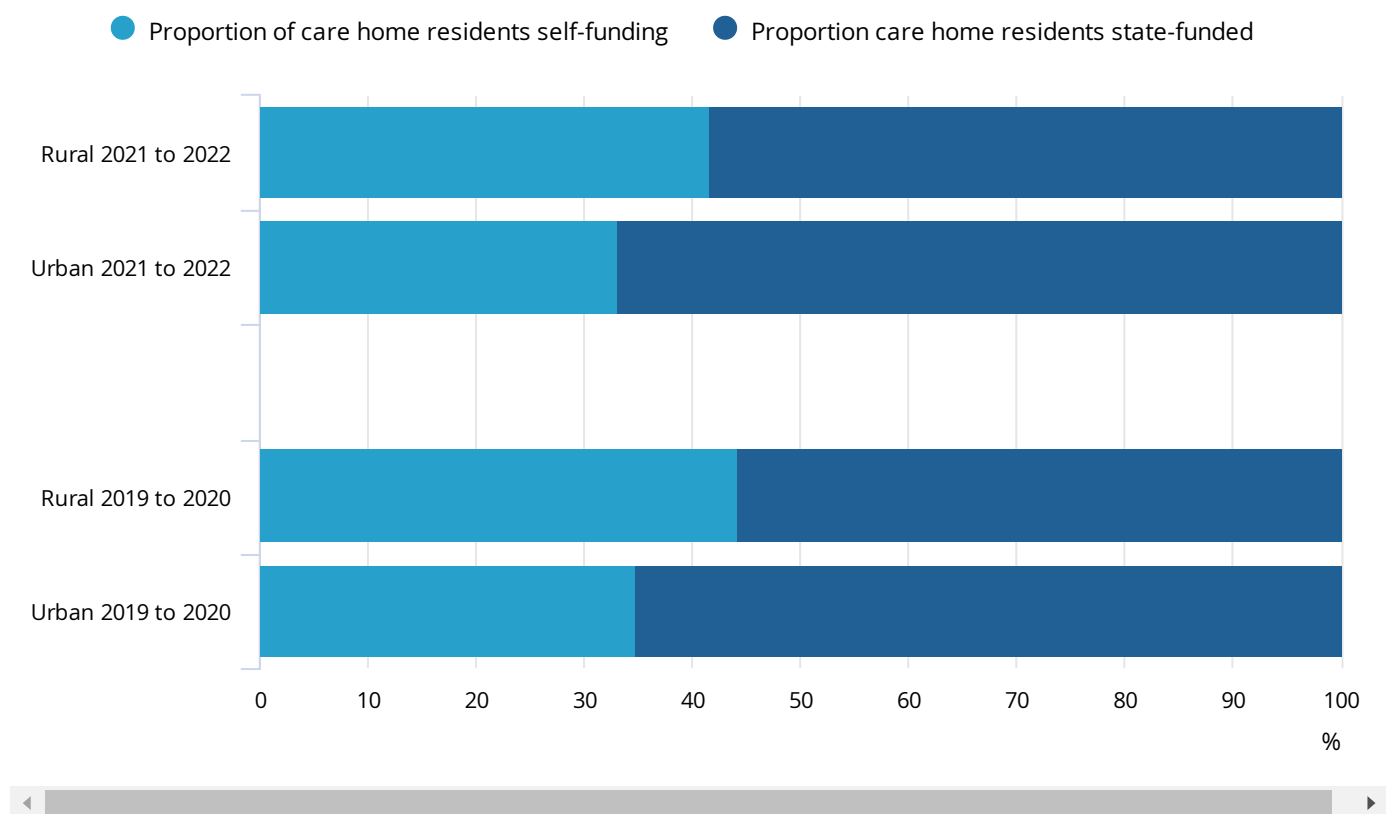
significant difference.

The other four LAs (Hart, Brentwood, Three Rivers and Rutland) with the highest proportion of self-funders were in the South East, East, or East Midlands regions. The other four LAs with the lowest proportion of self-funders were all in the London region (Hackney, Lambeth, Redbridge and Greenwich). Although the LAs in the top and bottom five positions have changed, the LAs are in similar regions to pre-coronavirus pandemic. The low proportion of self-funders in London, despite the high average house price, may be explained by the relatively young age of the London population and high proportion of privately rented dwellings (see [Section 3 of our article Care homes and estimating the self-funding population, England: 2019 to 2020](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2019to2020#geographic-breakdown-of-self-funders-in-care-homes) (<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2019to2020#geographic-breakdown-of-self-funders-in-care-homes>)).

Rural areas continued to have a statistically significantly higher proportion of self-funders (41.6%) compared with urban areas (33.2%), the same as pre-coronavirus pandemic (Figure 3).

### Figure 3: Rural areas have a higher proportion of care home residents who are self-funding compared with urban areas

Rural and urban classification by the proportion of self- and state-funded care home residents, England, 2019 to 2020 and 2021 to 2022



**Source:** Care Quality Commission - Provider information returns, Office for National Statistics

#### Notes:

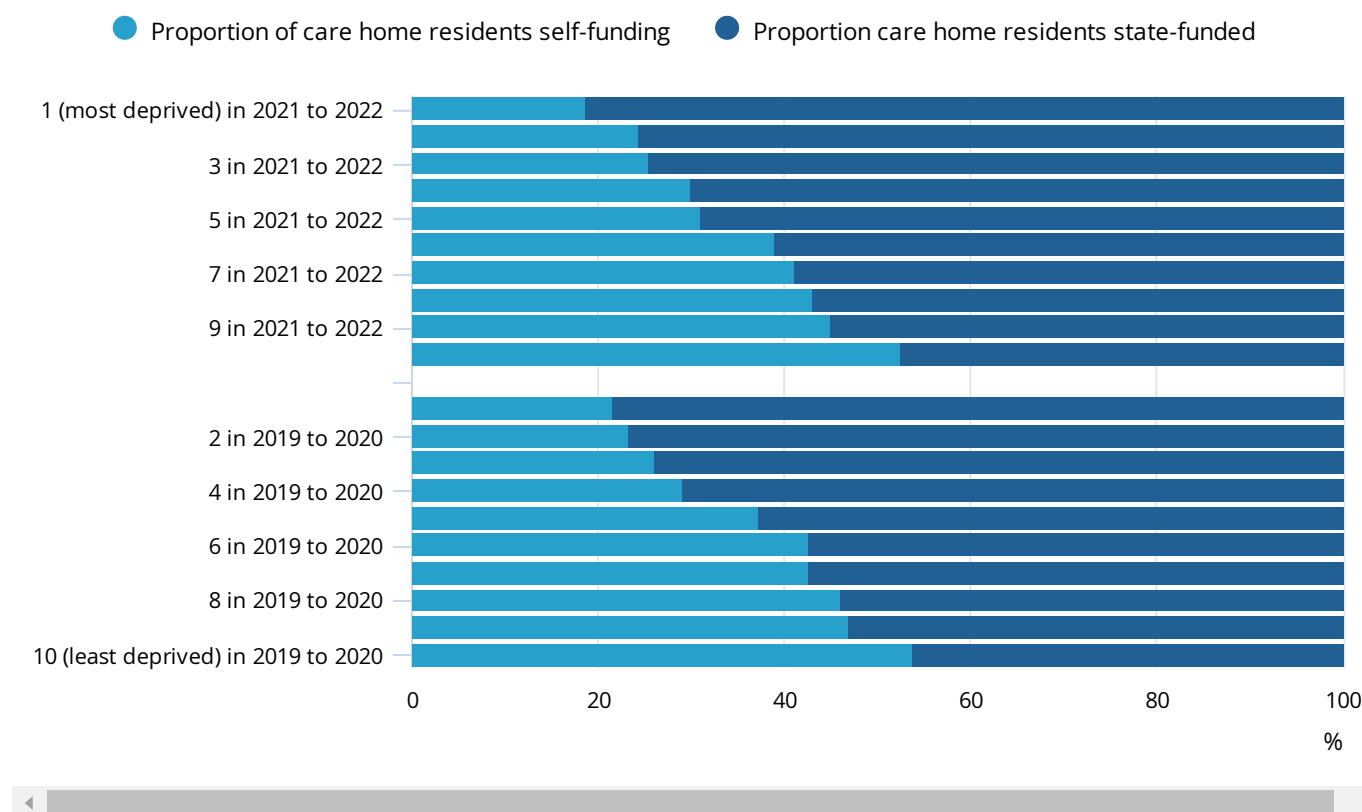
1. Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 August 2019 and 29 February 2020, and 1 March 2021 and 28 February 2022.
2. The rural and urban classification of care homes is based on the 2011 rural or urban classification at output areas using the latest geographies from [National Statistics Postcode Lookup File](https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-file) (<https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-february-2022/about>), available at the time of data analysis (August 2021 and February 2022).



Figure 4 shows that care homes in the most deprived areas (decile 1; see [Glossary \(https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary\)](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary) for further explanation) had a lower proportion of self-funders (18.7%) than care homes in the least deprived areas (decile 10; 52.5%). This difference was statistically significant, and the overall pattern of results was similar to pre-coronavirus pandemic.

## Figure 4: The most deprived areas had a lower proportion of self-funders when compared with the least deprived areas

Indices of multiple deprivation by the proportion of self-funding care home residents, England, 2019 to 2020 and 2021 to 2022



**Source: Care Quality Commission - Provider information returns, Office for National Statistics**

### Notes:

- Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 August 2019 and 29 February 2020, and 1 March 2021 and 28 February 2022.
- These groupings are based on the 2019 Index of Multiple Deprivation (IMD) (<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>) for England, ranging from 1 (most deprived) to 10 (least deprived).
- Figures are based on care home location identified in the latest National Statistics Postcode Lookup File (<https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-february-2022/about>), available at the time of data analysis (August 2021 and February 2022).

4. Details on the linkage between IMD and PIR can be found in the supporting [methodology](#).

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).

## 5. Comparing the proportion of self-funders by care home characteristics

This section analyses self-funders broken down by care home type, care home size, provider size, care home rating and nursing care provision.

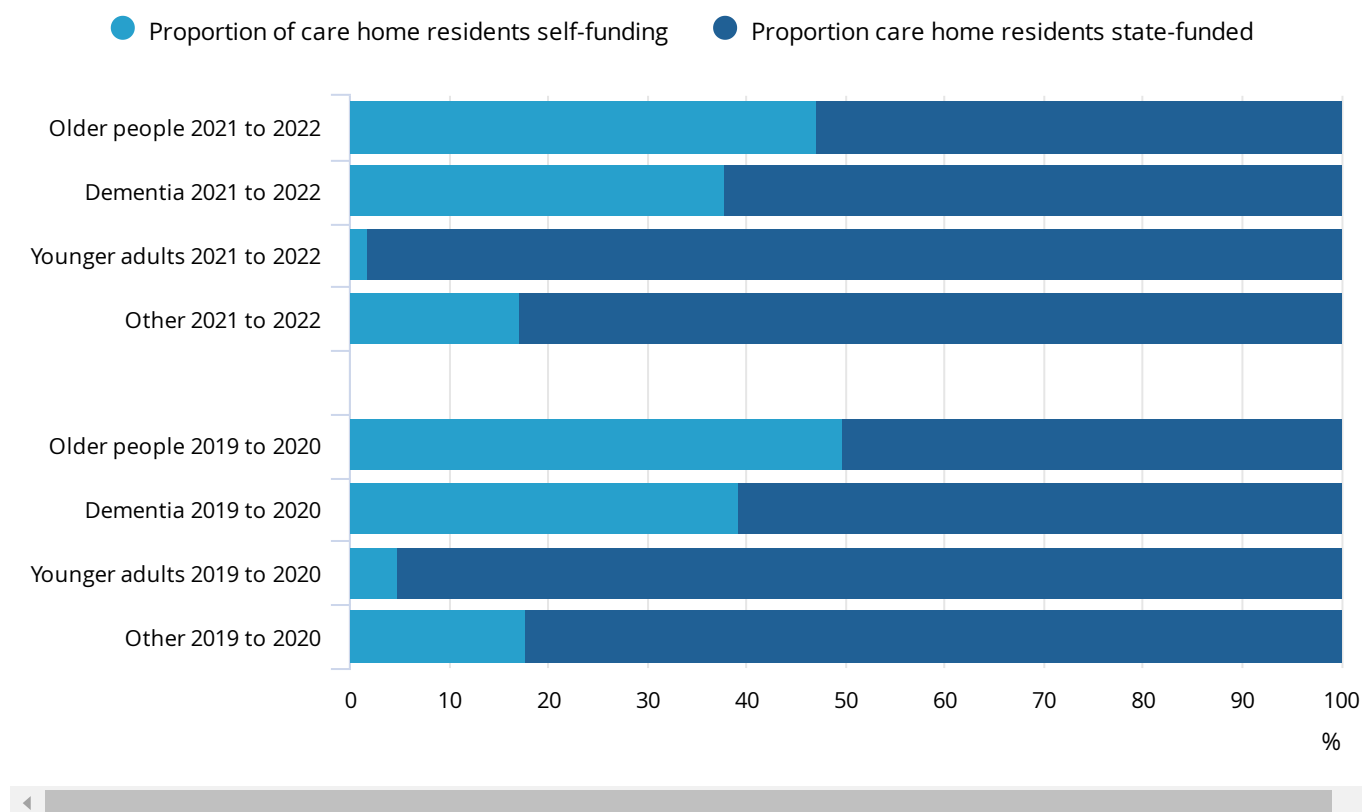
For care home type, the largest drop in the proportion of self-funders since before the coronavirus (COVID-19) pandemic is evident in care homes providing care for younger adults (aged 18 to 64 years). The proportion of self-funders in care homes providing care for younger adults was 1.9% from 1 March 2021 to 28 February 2022 and statistically significantly lower than all other care home types. This proportion was 4.8% pre-coronavirus pandemic. The overall pattern is the same as pre-coronavirus pandemic. When comparing the proportion of self-funders within each care home type, care homes providing care for older people (aged 65 years and over) have a statistically significantly higher proportion of self-funders (47.1%) compared with the proportion of self-funders in all other care home types (Figure 5). For more information about care home types please refer to [our Care homes and estimating the self-funding population, England: 2019 to 2020 - methodology](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology).

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).

It should be noted that the majority of self-funders (78.6%), and the majority of all care home residents (72.6%), are resident in care homes providing care for dementia; although not every resident in these homes will necessarily have dementia.

## Figure 5: Care homes providing care for older people have a higher proportion of self-funders than all other care home types

Care home type by the proportion of self- and state-funded care home residents, England, 2019 to 2020 and 2021 to 2022



**Source:** Care Quality Commission - Provider information returns, Office for National Statistics

### Notes:

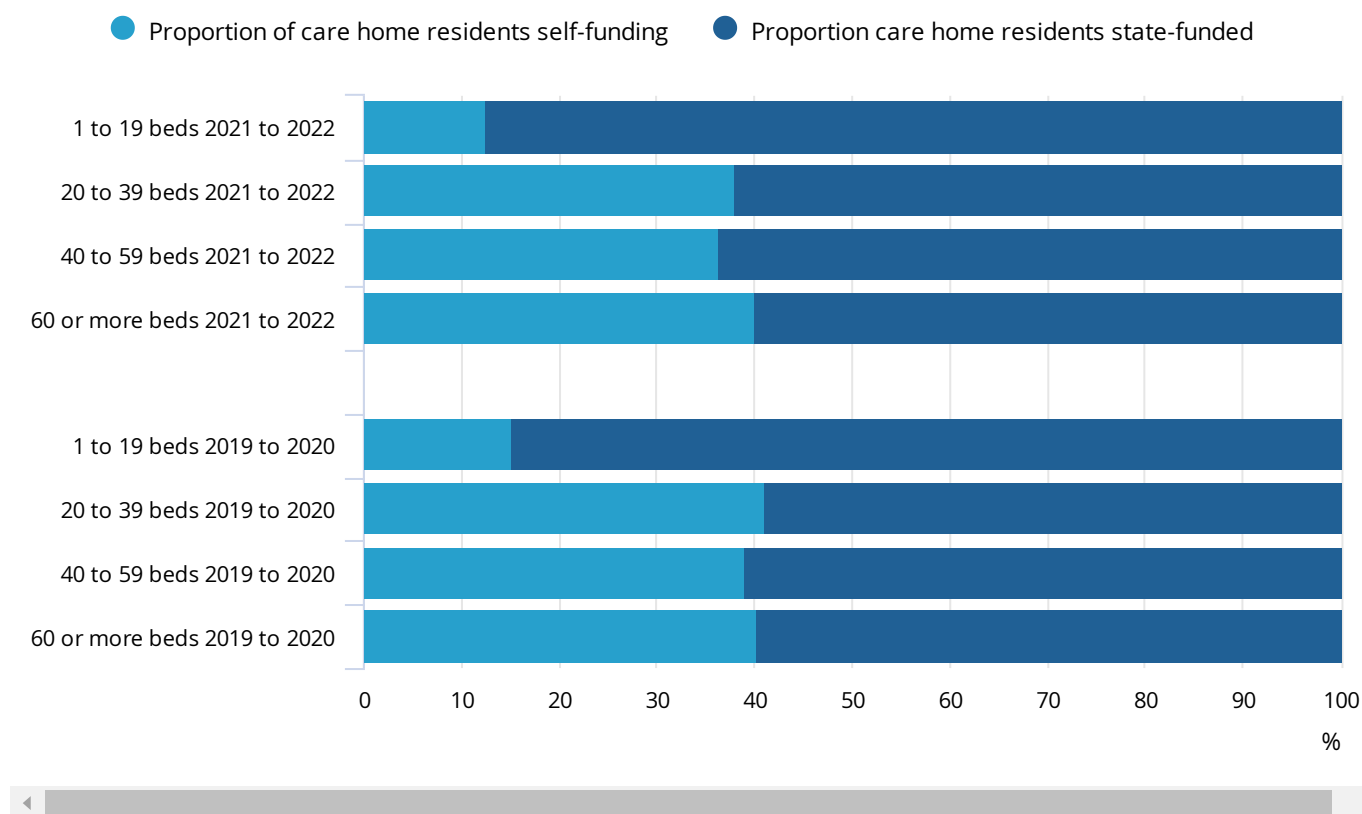
- Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 August 2019 and 29 February 2020, and 1 March 2021 and 28 February 2022.
- Care home types are derived using the [Care directory](https://www.cqc.org.uk/about-us/transparency/using-cqc-data) (<https://www.cqc.org.uk/about-us/transparency/using-cqc-data>) service user band variables (see [Glossary](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary) (<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary>)). Older people are those who have reached their 65<sup>th</sup> birthday onwards, and younger adults includes people from their 18<sup>th</sup> birthday to the day before their 65<sup>th</sup> birthday. For more information on care home types, see our [methodology paper](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary) (<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022#glossary>).

[are/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology\).](#)

Care homes with 1 to 19 beds had the smallest proportion of self-funders (12.5%; Figure 6). This was statistically significantly lower compared with all other care home sizes. Other care home sizes did not differ significantly from each other, the same pattern as pre-coronavirus pandemic.

## Figure 6: Care homes with 1 to 19 beds had a lower proportion of self-funders, compared with other care home sizes

Number of care home beds by the proportion of self- and state-funded care home residents, England, 2019 to 2020 and 2021 to 2022



**Source: Care Quality Commission - Provider information returns, Office for National Statistics**

### Notes:

- Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 August 2019 and 29 February 2020, and 1 March 2021 and 28 February 2022.
- Care home size has been determined based on the number of care home beds reported in the [Care directory](https://www.cqc.org.uk/about-us/transparency/using-cqc-data) (<https://www.cqc.org.uk/about-us/transparency/using-cqc-data>).

Care homes are categorised according to provider size using the Provider ID and Brand ID variables in the [Care Quality Commission \(CQC\) Care directory](https://www.cqc.org.uk/about-us/transparency/using-cqc-data) (<https://www.cqc.org.uk/about-us/transparency/using-cqc-data>). Care homes are either labelled using the Brand ID (if they are part of a brand of care providers) or Provider ID. If

the Brand or Provider ID is associated with more than one care home, they are categorised as being managed by providers that run multiple care homes. If the Brand or Provider ID is associated with a single care home in the directory, they are categorised as being managed as a single care home. Following feedback from users, this is a different categorisation process to [our previous release Care homes and estimating the self-funding population, England: 2019 to 2020](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2019to2020)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2019to2020>).

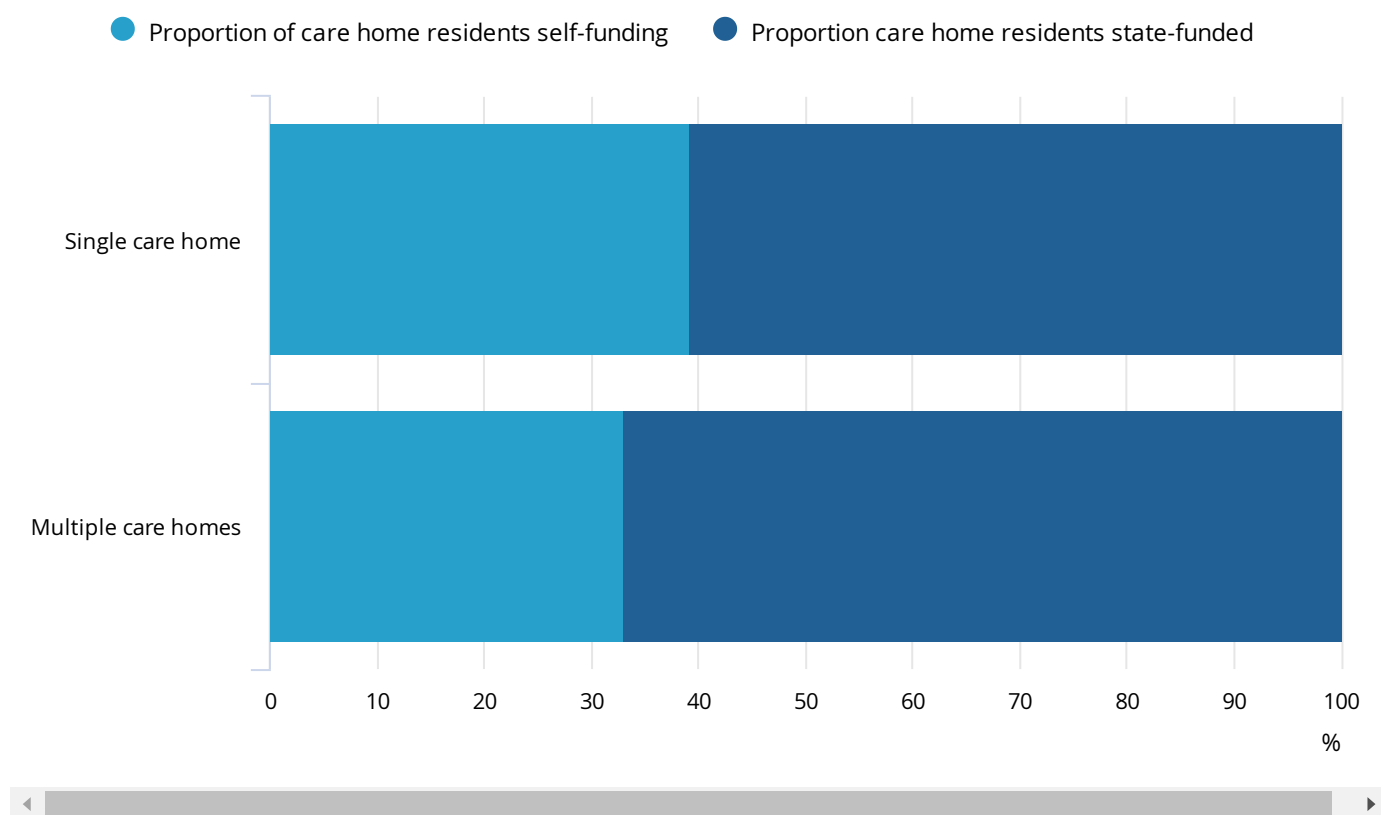
Therefore, the provider size figures presented here are not directly comparable with the provider size figures pre-coronavirus pandemic.

Care homes run by providers that have a single care home have a statistically significantly higher proportion of self-funders (39.2%) than those managed by providers that run multiple care homes (33.1%; see Figure 7).



## Figure 7: Care homes run by a provider with a single care home had a higher proportion of self-funders than providers running multiple care homes

Provider size by the proportion of self- and state-funded care home residents, England, 2021 to 2022



**Source: Care Quality Commission - Provider information returns, Office for National Statistics**

### Notes:

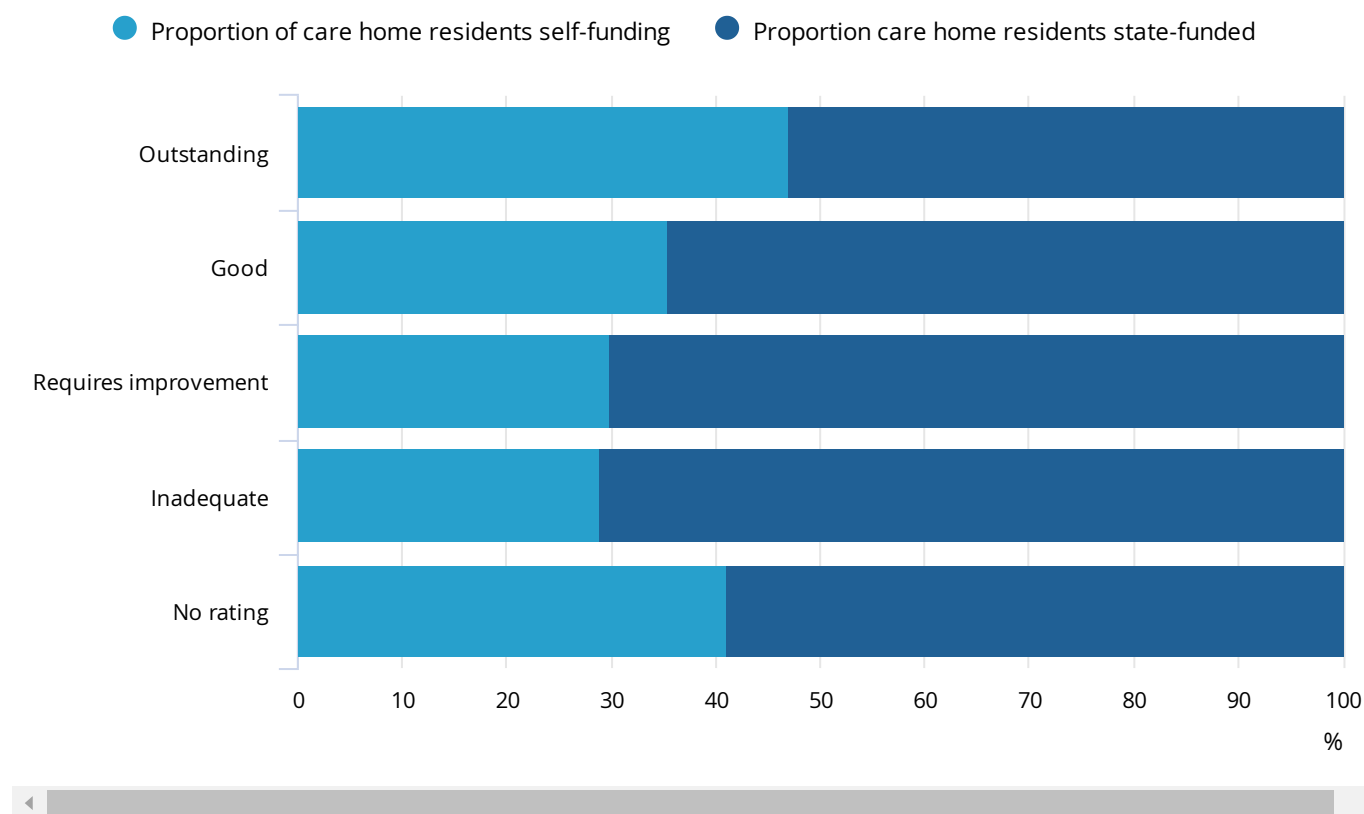
1. Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 March 2021 and 28 February 2022.
2. Provider size has been determined by the number of care homes run by a provider or brand reported in the [Care directory](https://www.cqc.org.uk/about-us/transparency/using-cqc-data) (<https://www.cqc.org.uk/about-us/transparency/using-cqc-data>).

Care homes rated outstanding had the highest proportion of self-funders (47.0%), which is statistically significantly higher than all other ratings, except for those care homes with no rating (see Figure 8). Care homes rated inadequate had the lowest proportion of self-

fundings (29.0%), however this was not statistically significantly different to care homes rated good (35.4%), care homes rated requires improvement (29.8%) or care homes with no rating (41.0%). These figures cannot be compared with pre-coronavirus pandemic figures as prior to 2021, the provider information return (PIR) was only sent to care homes that had been inspected at any point since provider registration. Therefore, there are no care homes with no rating for the pre-coronavirus pandemic data.

## Figure 8: Care homes rated outstanding had a higher proportion of self-funders, compared with care homes with other ratings

Care home rating by the proportion of self- and state-funded care home residents, England, 2021 to 2022



**Source: Care Quality Commission - Provider information returns, Office for National Statistics**

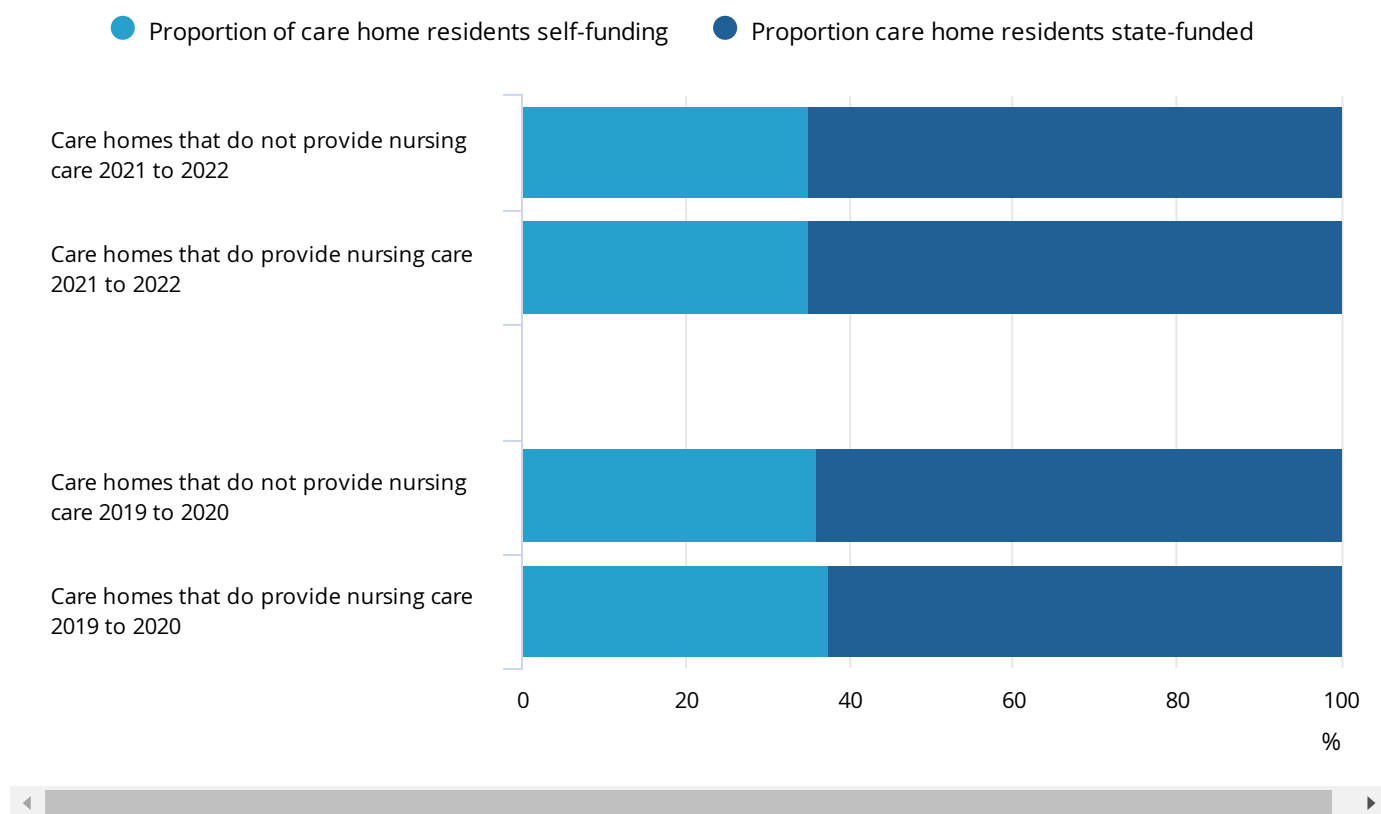
### Notes:

1. Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 March 2021 and 28 February 2022.
2. Care home rating is based on the [Care directory \(https://www.cqc.org.uk/about-us/transparency/using-cqc-data\)](https://www.cqc.org.uk/about-us/transparency/using-cqc-data).

In both care homes that do provide nursing care, and care homes that do not provide nursing care, 34.9% of residents are self-funded (Figure 9). It is important to note that not all individuals living in care homes that provide nursing care are necessarily receiving nursing care.

## Figure 9: Care homes that do and do not provide nursing care had the same proportion of self-funders

Care homes that do and do not provide nursing care by the proportion of self- and state-funded care home residents, England, 2019 to 2020 and 2021 to 2022



**Source: Care Quality Commission - Provider information returns, Office for National Statistics**

### Notes:

- Figures are weighted annual estimates based on the Care Quality Commission (CQC) provider information return (PIR) data collected between 1 August 2019 and 29 February 2020, and 1 March 2021 and 28 February 2022.
- Care home types are derived using the [Care directory](https://www.cqc.org.uk/about-us/transparency/using-cqc-data) (<https://www.cqc.org.uk/about-us/transparency/using-cqc-data>). For information see our [methodology paper](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology) (<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).
- Care homes reported as a Service type - care home service with nursing; in the [Care directory](https://www.cqc.org.uk/about-us/transparency/using-cqc-data) (<https://www.cqc.org.uk/about-us/transparency/using-cqc-data>) are defined

as providing nursing care (nursing homes). All other care homes in the population are defined as not providing nursing care.

## 6. Care homes for older people and dementia

A subset of variables was analysed for only care homes that provide care for older people, individuals with dementia or both, based on care home type rather than age of residents (see [our Care homes and estimating the self-funding population, England: 2019 to 2020 - methodology](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).

The proportion of self- and state-funders were calculated for:

- region
- Index of Multiple Deprivation
- care home size
- care home rating
- upper tier local authority
- nursing care provision

Please see our [accompanying datasets](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/datasets/carehomesandestimatingtheselffundingpopulationengland)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/datasets/carehomesandestimatingtheselffundingpopulationengland>) for these data.

Looking more closely at care home size, rating and nursing provision variables, the proportion of self-funders in the 1 to 19 beds category (34.5%) was statistically significantly lower than in the 20 to 39 beds category (41.2%), but not statistically significantly different from the other categories. The proportion of self-funders in the 20 to 39 beds category was also statistically significantly higher than in the 40 to 59 beds category (36.5%). This is in contrast to the findings from the whole sample (see Figure 6) but follows a similar pattern to care homes for older people and dementia before the coronavirus (COVID-19) pandemic.

For care home rating, the pattern of findings is similar to the full sample (see Figure 8). However, in care homes for older people and dementia, care homes rated good (40.0%) have a statistically significantly higher proportion of self-funders than care homes rated requires improvement (31.7%).

For nursing care provision, there was a statistically significant higher proportion of self-funders in care homes that do not provide nursing care (42.5%) compared with those that do (35.7%), which is the same pattern as last year. This was not statistically significantly different in the full sample (see Figure 9).

## 7. Care homes for working age adults

A subset of variables was analysed for only care homes that provide care for younger adults (aged 18 to 64 years), based on care home type rather than age of residents (see [our Care homes and estimating the self-funding population, England: 2019 to 2020 - methodology](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).

The proportion of self- and state-funders were calculated for:

- region
- Index of Multiple Deprivation
- care home size (the three larger categories were collapsed together because of small sample sizes)
- care home rating (outstanding and good were collapsed together, and requires improvement and inadequate were collapsed together, because of small sample sizes)
- nursing care provision

Please see our [accompanying datasets](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/datasets/carehomesandestimatingtheselffundingpopulationengland)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/datasets/carehomesandestimatingtheselffundingpopulationengland>) for these data.



## 8. Estimates of self-funding population in care homes data

Care homes and estimating the self-funding population, England

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/datasets/carehomesandestimatingtheselffundingpopulationengland>)

Dataset | Released 30 May 2022

An estimation of the size of the self-funding population in care homes in England, using an experimental method. Weighted annual data broken down by geographic variables and care home characteristics.

## 9. Glossary

### Care home resident

An individual who receives care in a place where personal care and accommodation is provided together. In this publication a care home refers to care homes with or without nursing care, however specialist college services are not included in this definition. You can find more information in [our Care homes and estimating the self-funding population, England: 2019 to 2020 - methodology](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology).

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).

### Self-funded care home residents ("Self-funders")

The provider information return (PIR) defines a self-funder as an individual who pays for their own care privately. They can receive this in a number of ways.

#### Organised by themselves or through the local authority

- This is where an individual is over the saving or income threshold and therefore organises their care themselves or requests the local authority to arrange the care for them, but the individual still funds the full cost.

#### Organised by a charity

- Individuals who receive care in a charity-run care home are also defined as self-funders, as the term charity refers to the organisation running the care home, but individuals who do not meet the eligibility criteria for state-funding will still be fully or partially self-funding.

### NHS-funded nursing care

- If an individual is in receipt of NHS-funded nursing care in a care home, they will have an amount paid for by the NHS, deemed to be the cost of the nursing care they receive. However, the rest of the cost could be self-funding, depending on their financial situation, therefore have been included in this definition.
- It is important to note that not all individuals in receipt of NHS-funded nursing care will be self-funding, they could also be in receipt of local authority support. NHS-funded nursing care should not be used to directly measure the size of the self-funding population.

### **State-funded care home resident:**

The PIR defines a state-funded care home resident as an individual whose care is funded in full or in part by the local authority and/or the NHS. This includes the following.

#### **Paying user charges when funded by local authority**

- This is where the local authority has assessed an individual as having care and support needs and the individual has savings or income below the upper savings or income threshold and is funded by a local authority. However, the individual may pay additional cost to the local authority (a user charge).

#### **NHS continuing healthcare**

- This is where an individual's needs have primarily been deemed as health-based, as per the decision support tool, and therefore care is fully funded by the NHS (state).

#### **Personal budget**

- This is where an individual has been assessed through the local authority as having care and support needs and has savings or income below the threshold, so is given a budget to arrange care themselves, for example through a personal assistant; however, care is still funded through the local authority.

## Third-party top up

- This is where an individual has been assessed through the local authority as having care and support needs and has savings or income below the threshold, therefore is state funded. However, their care may be more expensive than the local authority is willing to pay, so a third party pays an additional cost (this is not categorised as a self-funder, as this cannot be paid for by the individual).

## Care home types

Care homes have been categorised into four different groups based on the users that they provide care for. Users are derived by the service user band variables in the [Care Quality Commission Care directory \(https://www.cqc.org.uk/about-us/transparency/using-cqc-data\)](https://www.cqc.org.uk/about-us/transparency/using-cqc-data), which a care home is required to specify when registering as a provider. You can find more information in [our Care homes and estimating the self-funding population, England: 2019 to 2020 - methodology \(https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology\)](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology). The groups are defined as:

- dementia (all ages)
- older person (aged 65 years and over)
- younger adults (aged 18 to 64 years)
- other

A variable that combines the "older people" and "dementia" care home type categories has also been created. This contains an estimate of the proportion of self-funders in care homes that provide care to older people, care homes that provide dementia care, and care homes that provide both. These breakdowns are available in our [accompanying dataset \(https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/datasets/carehomesandestimatingtheselffundingpopulationengland\)](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/datasets/carehomesandestimatingtheselffundingpopulationengland).

## Statistical significance

The term "significant" refers to statistically significant changes or differences. Significance has been determined using the 95% confidence intervals, where instances of non-overlapping confidence intervals between estimates indicate the difference is unlikely to have arisen from random fluctuation. See our [statistical significance](https://www.ons.gov.uk/methodology/methodologytopicsandstatisticalconcepts/uncertaintyandhowwemeasureit#statistical-significance) (<https://www.ons.gov.uk/methodology/methodologytopicsandstatisticalconcepts/uncertaintyandhowwemeasureit#statistical-significance>) page.

## Index of Multiple Deprivation (IMD)

National deciles of area deprivation are created through ranking small geographical populations known as Lower layer Super Output Areas (LSOAs) based on their deprivation score from most to least deprived and grouping them into 10 divisions based on the subsequent ranking.

[The Index of Multiple Deprivation \(IMD\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019) (<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>) is a score based on the area as a whole, and not everyone within a LSOA necessarily experiences the same level or type of deprivation. For example, some unemployed individuals live in less deprived LSOAs, while some higher-income individuals live in more deprived LSOAs. Similarly, deciles are a broad grouping and the levels of deprivation and the underlying factors determining the LSOA-level deprivation score will vary within the decile. Those LSOAs at the higher and lower end of each specific decile may vary considerably from each other.

## 10. Data sources and quality

For a full description of our methods, please see [our Care homes and estimating the self-funding population, England: 2019 to 2020 - methodology](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology)

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).

Completion and submission of [provider information returns \(PIRs\)](https://www.cqc.org.uk/guidance-providers/adult-social-care/provider-information-return-pir-adult-social-care-services)

(<https://www.cqc.org.uk/guidance-providers/adult-social-care/provider-information-return-pir-adult-social-care-services>) was voluntary between March and June 2021 inclusive. After this period, from 1 July 2021, completion and submission was mandatory. Analysis includes data from PIRs submitted within the period of 1 March 2021 and 28 February 2022. Care homes are not sent a PIR during this period if they:

- have been registered for fewer than 10 months and have not yet been inspected
- are dormant
- are deemed to be under pressure

There were 13,629 care homes which were sent a link to an online PIR form, of these, 11,169 (82.0%) care homes responded. Of these, 11,091 responses were from care homes that were still active two months after they submitted the PIR, and therefore could be linked to the [Care Quality Commission \(CQC\) Care directory](https://www.cqc.org.uk/about-us/transparency/using-cqc-data) (<https://www.cqc.org.uk/about-us/transparency/using-cqc-data>) with registered beds, producing a final response rate of 81.4%. After validating, cleaning and editing the data, the final sample was 10,494 care homes, which is 68.6% of all care homes that were registered in the relevant time period (15,304 care homes). As part of the cleaning process, 175 care homes without a rating in the Care directory were assigned a rating based on information from the CQC website (see [Section 7, Care homes without a rating in our methodology](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology)

([https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/...](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology)

[methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology#weighting-the-data](#))) and the remaining care homes were categorised as having no rating.

Table 1 shows the differences between the distributions in cleaned and all other care homes in the Care directory. For more information on cleaning and potential bias in the sample, please refer to our methodology paper.

**Table 1: Distribution by English region, care home rating, size, and type for the cleaned provider information return (PIR) data and all other care homes in the April 2022 Care directory**

	<b>Cleaned care homes that completed a PIR (N=10,494)</b>	<b>All other care homes (N=4,810)</b>	<b>Absolute Percentage Difference</b>
<b>Percentage of care homes by region (%)</b>			
<b>East</b>	11.2	10.2	1.0
<b>East Midlands</b>	9.5	11.2	-1.6
<b>London</b>	9.1	8.6	0.4
<b>North East</b>	5.3	3.8	1.5
<b>North West</b>	11.5	14.7	-3.1
<b>South East</b>	19.4	18.5	1.0
<b>South West</b>	13.0	13.1	-0.1
<b>West Midlands</b>	10.7	11.4	-0.7
<b>Yorkshire and The Humber</b>	10.2	8.6	1.6
<b>Percentage of care homes by latest quality rating (%)</b>			
<b>Outstanding</b>	4.6	3.5	1.1
<b>Good</b>	77.6	70.5	7.1
<b>Requires improvement</b>	15.4	17.2	-1.8
<b>Inadequate</b>	1.2	2.3	-1.1
<b>No rating</b>	1.2	6.5	-5.3
<b>Percentage of care homes by care home size (%)</b>			
<b>1-19 beds</b>	41.3	43.0	-1.6
<b>20-39 beds</b>	27.8	24.9	2.8



<b>40-59 beds</b>	17.1	16.2	0.9
<b>60+ beds</b>	13.8	15.9	-2.1
<b>Percentage of care homes by care home type (%)</b>			
<b>Care homes for older people</b>	12.0	9.5	2.5
<b>Care homes providing dementia care</b>	49.7	51.2	-1.5
<b>Care homes for younger adults</b>	13.4	14.3	-0.9
<b>Other types of care homes</b>	24.8	24.9	-0.1

Source: Care Quality Commission - Provider information returns, Office for National Statistics

## Notes

1. Percentages may not add to 100% because of rounding.
2. The region variable was derived from the February 2022 National Statistics Postcode Lookup File (NSPL) which is linked to the Care directory. Where a region was not specified by the Care Quality Commission (CQC), the actual location of the care home was obtained from the NSPL.
3. Care home rating, size (number of beds) and types are derived using the Care directory. For more information see our methodology paper.



## 11. Related links

Care homes and estimating the self-funding population, England: 2019 to 2020 methodology

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/carehomesandestimatingtheselffundingpopulationengland2019to2020methodology>).

Methodology | Released 15 October 2021

Describes the development of a new experimental method estimating the size of the self-funding population in care homes in England. Includes how the data are collected, processed and produced as well as definitions and data sources.

Accessing adult social care in England

(<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/methodologies/accessingadultsocialcareinengland>).

Methodology | Released 15 October 2021

Summary, including diagram, of the different routes into residential and community care in England.

Adult Social Care Statistics in England (PDF, 348KB)

([https://osr.statisticsauthority.gov.uk/wp-content/uploads/2020/01/19\\_11\\_15\\_SocialCare\\_SRv3.pdf](https://osr.statisticsauthority.gov.uk/wp-content/uploads/2020/01/19_11_15_SocialCare_SRv3.pdf)).

Report | Released 16 January 2020

An in-depth review of Adult Social Care Statistics in England from the Office for Statistics Regulation (OSR). Includes an overview of adult social care in England, existing statistics available and the identified gaps in evidence.

UK adult social care statistics (<https://gss.civilservice.gov.uk/dashboard/tools/adult-social-care-statistics/database.html#about-the-database>)

Website | Updated monthly

This tool compiles official statistics relating to adult social care across the four nations: England, Northern Ireland, Scotland, and Wales, into one location. The landscape is updated each month with new publications from the previous month.

## Contact details for this article

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Part of

[Employ someone: step by step \(/employ-someone\)](/employ-someone)

# National Minimum Wage and National Living Wage rates

The hourly rate for the minimum wage depends on your age and whether [you're an apprentice](#).

This page is also available [in Welsh \(Cymraeg\)](#).

You must be at least:

- [school leaving age](#) to get the National Minimum Wage
- aged 23 to get the National Living Wage - the minimum wage will still apply for workers aged 22 and under

## Current rates

These rates are for the National Living Wage (for those aged 23 and over) and the National Minimum Wage (for those of at least school leaving age). The rates change on 1 April every year.

	23 and over	21 to 22	18 to 20	Under 18	Apprentice
<b>April 2022 (current rate)</b>	£9.50	£9.18	£6.83	£4.81	£4.81
<b>April 2023</b>	£10.42	£10.18	£7.49	£5.28	£5.28

## Apprentices

Apprentices are entitled to the apprentice rate if they're either:

- aged under 19
- aged 19 or over and in the first year of their apprenticeship

### Example

An apprentice aged 21 in the first year of their apprenticeship is entitled to a minimum hourly rate of £4.81.

Apprentices are entitled to the minimum wage for their age if they both:

- are aged 19 or over
- have completed the first year of their apprenticeship

### Example

An apprentice aged 21 who has completed the first year of their apprenticeship is entitled to a minimum hourly rate of £9.18.

## Previous rates

The following rates were for the National Living Wage and the National Minimum Wage from April 2016.

### Rates from 1 April 2021

	<b>23 and over</b>	<b>21 to 22</b>	<b>18 to 20</b>	<b>Under 18</b>	<b>Apprentice</b>
<b>April 2021 to March 2022</b>	£8.91	£8.36	£6.56	£4.62	£4.30

### Rates before 1 April 2021

Before 1 April 2021 the National Living Wage was for those aged 25 and over.

	<b>25 and over</b>	<b>21 to 24</b>	<b>18 to 20</b>	<b>Under 18</b>	<b>Apprentice</b>
<b>April 2020 to March 2021</b>	£8.72	£8.20	£6.45	£4.55	£4.15
<b>April 2019 to March 2020</b>	£8.21	£7.70	£6.15	£4.35	£3.90

	<b>25 and over</b>	<b>21 to 24</b>	<b>18 to 20</b>	<b>Under 18</b>	<b>Apprentice</b>
<b>April 2018 to March 2019</b>	£7.83	£7.38	£5.90	£4.20	£3.70
<b>April 2017 to March 2018</b>	£7.50	£7.05	£5.60	£4.05	£3.50
<b>October 2016 to March 2017</b>	£7.20	£6.95	£5.55	£4.00	£3.40
<b>April 2016 to September 2016</b>	£7.20	£6.70	£5.30	£3.87	£3.30

## Who gets the minimum wage

Read the information on [who is entitled to the minimum wage](#).

You can use the [minimum wage calculator](#) to check whether the National Minimum Wage or National Living Wage is being paid.

[Contact Acas](#) if you're not getting the National Minimum Wage and think you should be.

## Part of

[Employ someone: step by step \(/employ-someone\)](#)

## OGL

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## STATION WORKS, TISBURY

I have already expressed my thoughts about the planned development at Station Works in Tisbury, but would like to reiterate the following.

Firstly the proposed access to the site seems very unsuitable – especially for the elderly and parents with young children. Recent floods in Tisbury have highlighted how vulnerable this area is to flooding by the River Nadder – indeed the road under the bridge was impassable only last week. Navigation by means of traffic lights for vehicles on one side of the bridge, with the other side being used for pedestrian access seems ill thought out and dangerous and I am concerned about the speed of access for emergency vehicles, such as ambulances and fire engines.

I believe the site is totally inappropriate for a 40 bed care home. Tisbury Surgery currently looks after residents and patients in both a local nursing home and a residential home in the village. I would be interested to know what studies have been undertaken (apart from those relating to the developer's financial interests) to determine the requirement for a care home of this size.

The plans indicate inadequate parking provision and I feel isolation for patients/residents would be a real issue.

I'm also interested to know how this proposal 'ticks the box' for added employment in the area. I am very aware that care home staff are incredibly difficult to recruit and I imagine the number of jobs lost by development of the site could well exceed those gained.

Such a development would put tremendous additional strain on an already extremely pressurised G.P. practice and its ability to provide good and safe care to its patients. We now have over 4200 patients – twice as many as 20 years ago - but care is still delivered from the same building. Our 'weighted' list size (after NHS England's adjustment for age, medical conditions etc. of patients) indicates that the list is in excess of 5000.

The proposed care home, together with the residents in the proposed number of new homes would likely add almost 10% to the practice list. Patients in a care home demand significantly more medical intervention. A vague promise to include a 'limited medical facility' as outlined in the developer's application is meaningless (and bearing in mind the decision by the developer not to include funds for educational purposes one might well cast doubt on such a nebulous undertaking). This proposal would not only affect our ability to provide good patient care to the new residents and those in the care home, but would also be detrimental to how we are able to look after our current patients - many of whom are vulnerable and elderly and suffering from chronic medical conditions.

There is no capacity to extend the surgery building to allow for employment of more staff to meet any additional demands on our service – even assuming more G.P.s could be recruited. We have already converted all our non clinical rooms/areas in the surgery for blood taking and other clinical work. We have today audited G.P. appointments relating to the nursing home (i.e. not including the residential home) which requires approximately 475 G.P.

appointments annually – this extrapolates to a conservative estimate of over 1000 G.P. appointments based on a 40 bed care home. In order to deliver such care, a major investment in staff and premises would be required.

I understand that the feeling within the village is that whilst development of the site, which is an eyesore, is to be recommended, the number of houses should be reduced, that some light industrial units be included - as originally outlined in the neighbourhood plan, and that access is totally altered for the safety of residents - whether trying to access the village by vehicle or on foot. I am sure that a proposal more in keeping with the village itself would be welcomed with the emphasis on affordable houses on a fully decontaminated site with appropriate, safe access to the village.

If permission is to be considered for a care home, I strongly feel that input is vital - both from the Wiltshire Integrated Care Board (formerly the CCG) and all the local health services.

Dr. Adam Smith  
GP Partner  
Tisbury Surgery



DR. ADAM SMITH

Posted on the Wiltshire Council Planning Consultation Website – 17<sup>th</sup> November, 2021

I wish to express my great concern about the planned development at Station Works.

Firstly I consider the proposed access to the site particularly unsuitable. Recent floods in Tisbury have highlighted how vulnerable this area is to flooding by the River Nadder and the navigation of this particular area by means of traffic lights for vehicles with the other side under the bridge being used for pedestrian access seems ill thought out and dangerous. I am concerned about the speed of access for emergency vehicles, such as ambulances and fire engines.

The site seems inappropriate for a 40 bed care home. There is inadequate parking provision and I feel isolation for patients/residents would be a real issue. I should also be interested to know how this proposal 'ticks the box' for added employment in the area. I am very aware that care home staff are incredibly difficult to recruit – as can be evidenced by the residential home we already have in Tisbury and I believe the number of jobs lost by development of the site would far exceed those that might possibly be gained.

I also have considerable concerns about the necessity for a care home of this size. Such an enterprise would put tremendous additional strain on an already extremely pressurised G.P. practice. Tisbury surgery currently has over 4100 patients and this care home, together with the residents in the proposed number of new homes could add almost 10% to the practice list – and patients in a care home demand significantly more medical intervention. A vague promise to include a 'limited medical facility' as outlined in the developer's application is meaningless and bearing in mind the decision by the developer not to include funds for educational purposes one might well cast doubt on such a nebulous undertaking.

There is no capacity to extend the surgery building to allow for employment of more staff – even assuming more G.P.s could be recruited – of which there is a well publicised national shortage. We have already had to convert non clinical rooms/areas in the surgery for blood taking and other clinical work. The workload from the care home alone would mean a commitment of around a full day per week from a G.P. This proposal would not only impact severely on the practice's ability to provide good care to the new residents and those in the care home, but also our capacity to look after those patients currently registered with us – and this at a time of every increasing demand from those concerned for their health following the pandemic as well as many vulnerable patients with chronic medical conditions.

Whilst development of the site, which is an eyesore, is to be recommended I feel strongly that the number of houses should be reduced, that some light industrial units be included - as originally outlined in the neighbourhood plan, and that access is totally altered for the safety of residents - whether trying to access the village by vehicle or on foot.

A proposal more in keeping with the village itself would be welcomed with the emphasis on affordable houses on a fully decontaminated site with appropriate access to the village.

## REASON FOR REPORT TO MEMBERS

Contrary to PC's recommendation

Councillor Hooper has requested that this item be determined by Committee due to:

- the prominent nature of the site
- the interest shown in the application
- the controversial nature of the application

## SITE AND ITS SURROUNDINGS

An industrial site adjacent to the railway line at Tisbury Station on the 'far' side of the line from the settlement, adjoining open countryside. The site is cut into the hillside and comprises large span industrial buildings; a two storey prefabricated office block and areas of external storage adjacent to the railway line. The current main building was granted permission in 1967 and has been expanded since. Parmiters are an agricultural engineering concern (which falls within use class B2) who were long established and expanded onto former railway land.

The 'railway' boundary of this site is the former platform edge which can be clearly seen from the station side. The remaining boundaries are open countryside, mostly at an elevated level.

The site lies within the AONB. It is visible from a distance from Union Road/Monmouth Hill and The Avenue from which it reads with the station and its adjoining industrial units. It is substantially concealed from the roads in the vicinity of the site but very visible from the station platform.

Towards the northwest corner of the site is a pedestrian level crossing with user-controlled gates and a warning bell where FP 16 crosses the railway and goes through the edge of the site.

At the southwestern end of the site, there is industrial land in separate ownership, which takes access via this site to the south west of the site on the far side of the railway line are general industrial uses (B2)

Parmiters now occupy only part of the site, permission for subdivision for other industrial uses having been given under 02/0005.

The remaining buildings are currently vacant.

## THE PROPOSAL

In outline, to redevelop the site for a mixture of residential and business development.

The illustrative plans show residential areas to the northeast with the Business Enterprise Centre to the south west. The elevated grassed areas around the existing development within the red line are not included.

## PLANNING HISTORY

The main buildings on the site were erected under M & T 2838. There are no conditions.

There are numerous subsequent applications approved for extensions to the premises.

An improved access was granted in 1974.

Permission to subdivide the current premises for B1, B2 & B8 uses was granted under 02/005.

Expansion onto the former platform ( and diversion of FP16) appears to have occurred in , or shortly after 1970.

02/1367 for a mixed business/residential use was refused by WAC 28/11/02 for the following reasons:

*(1) This proposal is contrary to policies E2 & E12 of the adopted Salisbury District Local Plan and policy E16 of the deposited replacement Salisbury District Local Plan in that the proposal would result in the loss of a large employment site, does not result in demonstrable environmental or conservation benefits nor does it provide for a similar number and range of job opportunities. Furthermore, this is a large site and the loss of available land for employment/industrial use is of significant importance.*

*(2) The proposed development is considered by the Local Planning Authority to be contrary to Housing Policy H23 of the Salisbury District Local Plan in that it is located outside any housing policy boundary and the requirement for the dwellings has neither been justified in connection with the needs of agriculture or forestry nor are they 'affordable' housing for those unable to compete in the local housing market, nor are they replacement dwellings and notwithstanding that this is a brownfield site, not in accordance with other policies of the adopted local plan.*

*(3) The proposal is considered to be contrary to policy Tran 4 of RPG 10 in that it makes no provision for the safeguarding of land for improvements to the Waterloo - Exeter railway line, and to Tisbury Station in particular.*

*(4) The proposal is considered to be contrary to policy DP1 of the approved Wiltshire Structure Plan and the aims of PPG13 in that there are inadequate pedestrian links into the main settlement of Tisbury and it would lead to an increase in use of a pedestrian level crossing across the railway, which would increase the risk both to pedestrians and the operation of the railway.*

*(5) The proposal is considered to be contrary to policy G1 of the adopted SDLP, DP1 of the approved Wiltshire Structure Plan and the aims of PPG13 in that it is likely to lead to an increase in out commuting car borne traffic on a local road network that is ill suited to increased levels of demand*

*(6) The proposal is contrary to policy G1 of the adopted Salisbury District Local Plan in that it contains insufficient information to demonstrate that the site could be satisfactorily drained without an increased risk of flooding off site.*

*(7) The proposal is considered to be contrary to policy C2 and C6 of the adopted Salisbury District Local Plan in that the proposed 'gateway' residential development will be detrimental to the visual qualities of the designated AONB in that it will form an intrusion within an area where the railway bridge forms a clear visual break between the character of the settlement of Tisbury and the open countryside*

*(8) The proposal is considered to be contrary to policy R2 of the adopted Salisbury District Local Plan in that it makes no provision for recreational open space.*

## **CONSULTATIONS**

WCC Highways - Recommends refusal on highways grounds – 'The proposed development has not demonstrated that adequate provision can be made to accommodate the requirements of disabled people crossing the proposed new footbridge over the railway. This will lead to wheelchair users wishing to access the railway station and the main part of Tisbury village (and vice versa) having to travel via a circuitous route along a section of Class III road where there are no footways and where visibility is restricted to the detriment of highway safety'

WCC Education - None received-

Economic Development - Vail Williams report states that single occupation of this site is unlikely. Employment should be sited so as to avoid disturbance to residential use. The existing employment scheme on the other side of the railway was originally developed as small units but one user does occupy all now. VW report states there will always be a demand for this type of small business unit. Demand is there at the right price. This would suggest that the employment element of this site could be as viable as the developers are prepared to make it. VW do conclude that it may well be difficult to bring forward speculatively built space in rural towns. This makes the retention of existing space important. Dated factories in rural areas are unlikely to be in demand. Any redevelopment for residential use should cross subsidise new business units more suited to local markets.

Housing & Health Officer - Repeats observations on previous application - - Site was once railway marshalling yard and gas works. A full contaminated land survey is therefore required. Also has concerns about use of site for residential purposes relating to noise & disturbance from railway line, station parking and the existing industrial uses that adjoin the site. In addition in a 1 in 100 year flood event the River Nadder could flood the road between the river bridge and railway bridge by 500 – 730 mm in depth. with a similar or greater depth under the railway bridge. In such an event vehicular access to the town would be denied to the residents of the proposed dwellings.

Wessex Water Authority - Foul sewer & water available but no surface water sewers.

Developer needs to investigate satisfactory methods of surface water disposal.

Environment Agency - Site is elevated above river but extreme events may cause flooding of road into Tisbury centre. Requires surface water drainage condition to ensure that run off from this site does not cause flooding elsewhere. Also ensure foul drainage is adequate, land contamination conditions and pollution prevention.

SELCA - No objections provided the provision of a second railway track and the reinstatement of the down platform is not prejudiced.

Network Rail - supports application as would enable down platform to be reinstated and public footpath to be diverted over footbridge. at applicants expense . Will adopt footbridge. Concerned about 'leaves on the line' and encloses schedule of recommend tree species.

SWRDA - Awaited

## REPRESENTATIONS

Advertisement	Yes – Expiry date 1/01/04
Site Notice displayed	Yes – Expiry date 1/01/04
Departure	No – in view of recommendation. – to H22 if approved
Neighbour notification	Yes Expiry date 25/12/03
Third Party response	Yes

21 copies of a circular letter of objection on the following grounds:

Great shortage of small workshop space – site would be best developed as a light business park and site could accommodate greater number of affordable homes. Tisbury has too many houses that only the commuter and retired can afford.

1 letter of observation that footbridge including disabled access should be condition of approval, bridge should span both lines plus down platform width, need to reinstate second rail line, facilitate down platform reinstatement.

3 letters of support on grounds of brownfield site, mixed use promoted by PPG1, site is close to village centre, preferable to allocated site in Hindon Lane, room to provide footpath on road from station to railway bridge., very accessible site next to station, will enhance appearance of AONB, would be preferable to place pedestrian footbridge rather than restrict carriageway over river bridge, suggests recon. Stone, rustic brick and render with tiles and slates as suitable materials. (No tin sheeting) development would satisfy allocation of housing for Tisbury, all mains services available on site.

5 letters of objection on the grounds of: No demand for buildings currently onsite but is demand for smaller industrial units which this site is well suited for, permission for housing will increase value of land dramatically, workshop units in market housing development unsuitable, site is not allocated for housing , site should be retained for commercial use- it is not surplus to business requirements as a site – it is just the buildings that are , too few affordable housing units proposed, development should be for affordable houses and business use only – no market housing, an industrial site set apart from the village as this is a valuable asset, government has no requirement for every Brownfield site to be developed for expensive housing , why have Parmiters not moved if they need to? Single lane working across bridge will cause chaos, direct access to the station should be provided, queries capacity of village infrastructure, road floods badly at Three Arch bridge and Pool Bridge, footbridge over railway will be blot on the landscape, loss of car parking at station, will be separated from rest of settlement by railway not a suitable site for housing and does not comply with PPG 3 in terms of 'creating places and spaces with the needs of people in mind', footbridge will be deterrent for elderly and young families, site has been insufficiently marketed, will reduce employment land supply in Tisbury which would need to be replaced elsewhere, need to provide additional station car parking, would undermine strategy of Local plan.

Parish Council response                    yes – support subject to conditions

- Should be 66 houses not 80
- Large executive dwellings would not be acceptable
- Low cost market houses should be covenanted for the future
- Affordable housing should be contracted to remain affordable in perpetuity
- Parking for the railway station lost by ramped bridge provision must be replaced
- Proposed ramp must be accessible for all including disabled users
- Installation of separate footbridge across the river rather than narrowing carriageway on road bridge;

## MAIN ISSUES

1. Planning Policy – Salisbury District Local Plan
2. Planning Policy – Structure plan issues
3. How this application differs from the previous refusal & whether the reasons for refusal have been overcome
4. Government Guidance
5. Strategic rail issues
6. Land contamination
7. Drainage and flooding

## 8. Highways and access

### **POLICY CONTEXT**

G1,G2,G4,D1,E16 ,H22 , H25, CN11, C5,TR12,R2,R4,SDLP

Dp1 T2 Wilts Structure Plan

Tran 4 - RPG10

PPG3

Regional planning guidance Para 8:10

### **PLANNING CONSIDERATIONS**

#### **Planning Policy**

The key policy in the consideration of this application is E16, which states:

*E16 - On land allocated or currently used for employment purposes, the construction, change of use or redevelopment of premises for other purposes will only be permitted where the proposed development is an acceptable alternative use that provides a similar number and range of job opportunities. The only exceptions to this are where the land or premises are no longer viable for an employment generating use and/or where redevelopment of a site for a non-employment use would bring improvements to the local environment or conservation benefits that would outweigh the loss of local jobs*

There are no demonstrable environmental nor conservation benefits that would outweigh the loss of local jobs on this site. The site is outside the conservation area – though visible in part from it but redevelopment would not, in its historic context of large-scale buildings in the foot of a valley, provide any positive conservation benefit.

To demonstrate that an employment generating use is no longer viable it is incumbent upon the applicant to market the site.

Evidence of marketing is a material consideration in the determination of the application. This evidence shows that it has not been marketed for freehold sale, merely for short term leasing. Nevertheless the site is two thirds occupied.

The applicant's agents advise that the buildings are outdated and unsuited for modern business and acquisition, demolition and redevelopment would not be viable for purely employment uses. Nevertheless an offer has been made to acquire the site, albeit by the potential developers of the Hindon Lane site.

The main buildings on the site are not dissimilar in type to large agricultural buildings that have received consent for B1/B2/B8 uses. This is a more sustainable site than an isolated farm, and the attraction of such buildings is often economic. There are currently occupiers of the site, despite the type of buildings upon it, which would seem to bear this out.

The applicants agents advise that Parmiters currently employ 32 people. 11 office staff, 2 in sales and 19 industrial. They envisage a broad range of job opportunities in the business enterprise centre within B1 use class. They advise that Parmiters are looking to relocate within 10 miles of Tisbury and to be nearer the A303.

The site currently has the benefit of B1, B2 & B8 uses. The proposed Business Park will also be for those uses but is only one third (approx) of the area and would be unsuited for general industrial uses at its northeastern end owing to the proximity to residential development. It would therefore cause a loss in the range of jobs available by the loss of general industrial employment. As stated above, there are no demonstrable conservation nor environmental benefits put forward, other than a reduction in HGV traffic, which does not in itself, affect Tisbury as such vehicles cannot get under the bridge, but could possibly benefit Ansty.

The proposal includes some business use, but the part adjoining the proposed residential development would need to be within class B1. There are likely to be other B1 facilities available in the locality , for example the proposed change of use at Place Farm, but there are no other level sites of this size within Tisbury to accommodate B2 uses. The location of the Hindon Lane allocation on top of a hill in proximity to residential property makes it much less suited to large buildings or general industry.

Policy H22 states:

*In the main settlements of the District, residential development will be permitted on previously developed urban land outside a Housing Policy Boundary provided that the site is:*

- (i) not identified for an alternative form of development in this Local Plan;*
- (ii) well related to the existing pattern of development; and*
- (iii) accessible by public transport.*

*Proposals which would involve land currently in employment use will only be permitted if the business is relocated to an alternative site in the settlement which does not increase reliance on the private car, or the land and building(s) are unsuitable and not viable for alternative employment uses.*

It is not currently known to where Parmiters will relocate, but an alternative site as well served as this by public transport as this one does not exist in the locality. The applicant's agents advise that Parmiters are looking 'within 10 mile radius in Salisbury District'. Tisbury has a good rail service but the only other station in the district is Salisbury itself. It is therefore likely that any relocation would increase car usage. The buildings are large industrial 'sheds' and an office block and are therefore likely to be suitable for alternative employment uses.

As some two thirds of the buildings are occupied they are still suited for employment purposes and it is still considered that the non viability of the buildings has not been clearly demonstrated.

It is therefore considered that the criteria of policy H22 have not been met.

The proportion of affordable housing new proposed is 25%. This meets the requirement of policy H25.

The residential use would generate an open space requirement under policy R2. It would also generate contributions for community facilities under policy R4- the swimming pool being a relevant project ( and a requirement for the Hindon Lane site).

### **Approved Wiltshire Structure plan**

Policy DP1 is concerned with sustainable patterns of development. It advises that:

PARTICULAR PRIORITY SHOULD BE GIVEN TO:

1. MEETING LOCAL NEEDS FOR JOBS SERVICES AND AFFORDABLE AND SPECIAL NEEDS HOUSING IN ALL SETTLEMENTS

This proposals reduces the range of local job opportunities and would displace a long established local employer.

3, ACHIEVING A PATTERN OF LAND USES AND ASSOCIATED TRANSPORT LINKS WHICH MINIMISE THE NEED TO TRAVEL AND SUPPORT THE INCREASED USE OF PUBLIC TRANSPORT, CYCLING AND WALKING.

The relocation of local employer is likely to increase travel for its employees. Notwithstanding the proposed business development on the site and the proximity of the station, the proposal is likely to encourage out – commuting from Tisbury even if much of it is by train. The pedestrian links to the High Street from this site are poor, involving an unmanned level crossing or a walk along a road with no continuous footway. No cycle links have been put forward. The applicants are proposing a bridge across the line to substitute for the pedestrian level crossing, however, there is insufficient room to make this fully DDA compliant.

Policy T2 Advises

AN APPROPRIATE LEVEL OF PUBLIC TRANSPORT PROVISION SHOULD BE SECURED TO SERVE IDENTIFIED NEEDS ARISING FROM EXISTING AND PROPOSED DEVELOPMENTS

This has relevance to the strategic rail issues detailed below and could, should the application be approved, justify the requirement for the donation of the land required for the second platform at the station and require the provision, by the developer of a footbridge to replace the level crossing and contributions to an improvement to the rail service.

### **How this application differs from the previous refusal & whether the reasons for refusal have been overcome**

There has been a material change in planning circumstances since the last refusal in that there is a new adopted local plan. Reason 1 has not been overcome for the reasons given above. Reason 2 is no longer relevant, however, it is considered that the proposal does not accord with policy H22.

The previous application had the business area sandwiched between two residential areas. This application has the business element at the southwestern end and the residential element at the northeastern end. It is now proposed for B1, B2 & B8 uses but is only just over one third of the developable site area.

There is no development proposed at the access, which will remain as a landscaped area.

This overcomes reason for refusal 7.

It also reduces the potential for conflict with the B2 uses on the other side of the railway.

It also includes a new footbridge. This overcomes concern about the increased use of the level crossing in that it is intended that the footbridge will replace it, but there is still concern that if this footbridge is not fully DDA compliant that there will be no adequate access into the village from the residential units, particularly on the occasions when the road under the three arch bridge is flooded.

The proposal also includes off site highway works to the river bridge. These are in general considered satisfactory and could form the basis of a legal agreement with WCC. It is therefore considered that reason 4 has been overcome in part.

As indicated on the previous refusal, reasons 6, & 8 could be overcome by condition.

### **Government Guidance**

PPG3 encourages the best use of land and encourages housing on 'previously developed land'. Part of this land is still occupied and the vacant buildings have planning permission for subdivision for industrial use. Para 31 lists the criteria for allocating housing sites. One is accessibility by means other than the car. The great advantage of this site is its proximity to the station which has a regular passenger service every day and into the evenings. However, pedestrian links into Tisbury are poor. Another aspect is the possibility that this site may be contaminated and the need for a surface water scheme that does not exacerbate flooding elsewhere.

PPS7 (consultation paper) Deals with 'Sustainable Development in Rural Areas'. Para 6 states the 'Planning Authorities should support a wide range of economic activity in rural areas' and that it should 'make provision for new buildings as well as the re use of existing buildings for industrial and business development.'

The potential loss of employment opportunities in the industrial sector that this proposal represents would appear to run contrary to those aims.

### **Strategic Rail Issues**

Policy Tran 4 of RPG10 sets out Transport Infrastructure investment priorities. Amongst these are the improvements to the Waterloo – Exeter line to provide enhanced frequencies and adequate capacity. To achieve this the line will be dualled (the SWARRMS report refers) and this requires the reinstatement of the down platform at Tisbury.

This is a matter which, should the application be approved, could be achieved via a S106 agreement requiring the conveyance (at possibly nil cost) of a designated strip of land to Network Rail to provide a down platform plus a financial contribution towards the enhanced for which the housing development would create a demand. It would also be reasonable to replace the level crossing of the footpath and the railway – not only in the grounds of pedestrian safety but also to reduce the number of such crossings in the interests of rail safety and enhancement of the service.

The proposal incorporates a footbridge across the line to replace the crossing which must be seen as a positive benefit. This will lose 14 car parking spaces in the well used station car park. It would be reasonable to require their replacement within the application site. However, the footbridge is a stepped ramp and therefore unsuited to use by wheelchairs. There is insufficient space to

accommodate a full ramp in the location proposed. An alternative, but far more costly solution would be an underpass. As this matter remains unresolved, therefore, should the application be refused, it must be included as a reason for refusal.

### **Visual Impact**

The conservation officer has concerns about the visual impact of footbridge upon both the Victorian station (not listed) and the Conservation Area from which it will be visible.

### **Land Contamination**

This is a matter that can be addressed by condition. It is likely that this site is contaminated by reason of its former uses and may therefore require some remediation. This could render it less suitable for residential development, depending on the findings of any contamination study.

### **Drainage and Flooding**

Flooding occurs under Three Arch Bridge in extreme events rendering the road impassable and cutting the site off by road from Tisbury. Surface water drainage would need to be conditioned to ensure this was not worsened by the development and to ensure that any run off did not adversely affect the River Nadder which is an SSSI.

### **Access & Highways**

The road network around Tisbury is restricted to unclassified and 'C' class roads, all of which have a restricted width at some point. Rail connections to Salisbury/Gillingham are good and the station is well used. Bus services are poor. Tisbury has a broad range of facilities, shops, sports centre, schools (though not secondary education). The site is within walking distance of most of these facilities but there is no continuous footpath to the High Street. Pedestrian access exists across the railway but unless a footbridge is provided this is hazardous. The footbridge proposed will not cater for all and owing to the narrowness of the footway under the railway bridge makes it unsuited for wheelchairs and pushchairs. Furthermore this site can be cut off from the village for vehicular traffic in times of flood. WCC have verbally advised they will object to the proposals on this basis. The proposals incorporate offsite works to improve pedestrian facilities across Pool Bridge and one way working of cars. WCC consider this acceptable in principle.

Residential use of this site will increase pedestrian demand for access to the village via the footpath. If the footbridge over which it is diverted does not cater for those with disabilities then this runs contrary to the council's core values. This is further borne out by the need for fully accessible crossings of railway lines being a condition on an appeal at Southampton Parkway station.

With a decline in local employment, there is a likelihood of the residential occupiers of this site working elsewhere. Not all will commute by train. Also there is a high likelihood of day-to-day car trips as Tisbury has no supermarket and a limited range of schools.

### **CONCLUSION**

This is a key site for Tisbury. The proposal brings with it a number of benefits - land reserved for a new down platform, a proportion of affordable housing, the replacement of a pedestrian level crossing with a footbridge. However, the first would be a requirement for any redevelopment of this site, and the footbridge as currently proposed is not accessible to all. Although the business enterprise centre could provide small units of the type required this does not outweigh the loss of potential employment land and the displacement of the existing occupiers.

The proposal does not therefore accord with the principle of sustainable communities and as a result conflicts with policy G1.

The applicant has not adequately demonstrated the non-viability of the site for employment purposes as required policy E16.

The details of the crossing of the river and railway are still unclear and although a satisfactory solution can be found for the former, it has not for the latter. The footbridge raises visual impact issues in itself.

**RECOMMENDATION:** **REFUSE** for the following reasons:

:

(1) This proposal is contrary to policy E16 of the adopted Salisbury District Local Plan in that the proposal would result in the loss of a large employment site, does not result in demonstrable environmental or conservation benefits nor does it provide for a similar number and range of job



opportunities. Insufficient evidence has been supplied to demonstrate that the site is not viable in its entirety for employment uses. Furthermore, this is a large site and the loss of available land for employment/industrial use is of significant importance.

(2) The proposed development is considered by the Local Planning Authority to be contrary to Housing Policy H22 of the adopted Salisbury District Local Plan in that the relocation of the existing business is likely to lead to increased reliance on the private car and insufficient evidence has been supplied to demonstrate that the site is not viable for alternative employment uses.

(3) The proposal, which involves the loss of employment land in a settlement where there has been a loss of such land over the years, is contrary to policy G1 of the adopted Salisbury District Local Plan and DP1 of the Wiltshire Structure Plan in that it does not help create sustainable communities

(4) The proposal is considered to be contrary to policy DP1 of the approved Wiltshire Structure Plan and the aims of PPG13 in that The proposed development has not demonstrated that adequate provision can be made to accommodate the requirements of disabled people crossing the proposed new footbridge over the railway. This will lead to wheelchair users wishing to access the railway station and the main part of Tisbury village (and vice versa) having to travel via a circuitous route along a section of Class III road where there are no footways and where visibility is restricted to the detriment of highway safety.

(5) The proposal is considered to be contrary to policy G1 of the adopted SDLP, DP1 of the approved Wiltshire Structure Plan and the aims of PPG13 in that it is likely to lead to an increase in out commuting car borne traffic on a local road network that is ill suited to increased levels of demand

(6) The proposal is contrary to policy G1 of the adopted Salisbury District Local Plan in that it contains insufficient information to demonstrate that the site could be satisfactorily drained without an increased risk of flooding off site.

(7) The proposal is considered to be contrary to policy R2 & R4 of the adopted Salisbury District Local Plan in that it makes no provision for recreational open space or community facilities .

#### INFORMATIVE: -

The applicant is advised that reason 6 can be overcome by the submission of a detailed surface water drainage scheme.

The applicant is advised that reason 7 can be overcome by submission of a planning obligation for the provision of these facilities.



House of Commons  
Communities and Local  
Government Committee

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# Housing for older people

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## Second Report of Session 2017–19

*Report, together with formal minutes  
relating to the report*

*Ordered by the House of Commons  
to be printed 5 February 2018*

**HC 370**

Published on 9 February 2018  
by authority of the House of Commons

## Communities and Local Government Committee

The Communities and Local Government Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department for Communities and Local Government.

### Current membership

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[Mike Amesbury MP](#) (*Labour, Weaver Vale*)

[Bob Blackman MP](#) (*Conservative, Harrow East*)

[Helen Hayes MP](#) (*Labour, Dulwich and West Norwood*)

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The following member was on the Committee during the inquiry:

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The Committee is one of the departmental select committees, the powers of which are set out in House of Commons Standing Orders, principally in SO No 152. These are available on the internet via [www.parliament.uk](http://www.parliament.uk).

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Committee reports are published on the Committee's website at [www.parliament.uk/clg](http://www.parliament.uk/clg) and in print by Order of the House.

Evidence relating to this report is published on the [inquiry publications page](#) of the Committee's website.

### Committee staff

The current staff of the Committee are Edward Beale (Clerk), Jenny Burch (Second Clerk), Tamsin Maddock, Nick Taylor (Committee Specialists), Tony Catinella (Senior Committee Assistant), Eldon Gallagher (Committee Support Assistant), Gary Calder and Oliver Florence (Media Officers).

### Contacts

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## Summary

It is a well-known fact that we have an ageing population. But what steps are we taking to ensure that the housing on offer for older people now and in the future is suitable?

We decided to examine this topic because housing in later life is important: people's housing needs and preferences often change as they grow older and they may want to make changes to how and where they live. Furthermore, an appropriate, comfortable and well-located home can improve a person's physical and mental health, wellbeing, social life and independence, while the converse can have a detrimental effect.

Like any other age group, older people are diverse and their housing needs and options are similarly varied, reflecting their age, tenure, geographical location, income, equity, health and individual preferences. We found that this gives rise to a range of issues—from home maintenance, adaptations and repairs, to access to financial advice, and to housing supply—all of which are reflected in this report.

We believe that this broad and complex subject calls for **a national strategy which brings together and improves the policy on housing for older people**, and encompasses the recommendations made in this report. The key recommendations are as follows:

- **The existing FirstStop Advice Service should be re-funded by the Government to provide an expanded national telephone advice service, providing holistic housing advice to older people and signposting them to local services.**

Central to the national strategy is wider availability of housing advice and information to help older people make informed and timely choices about how and where they live.

- 
- **The coverage of Home Improvement Agencies (HIA) should be expanded so there is access to at least one HIA with a handyperson service in each local authority area.**

Most older people do not plan to move and wish to stay in their current home as long as possible. HIAs and handyperson services, undertaking small repairs, maintenance and adaptations, have a significant role to play in ensuring that the homes of those who 'stay put' are comfortable, healthy and safe.

- 
- **A range of measures to help older people overcome the barriers to moving home should be implemented: an accreditation for companies which provide tailored services for older people moving home; better customer service and guidance from lenders when applying for a mortgage; and widened access to shared ownership and shared equity.**

Many older people would like to move in later life but often the practical, financial and emotional aspects of moving home prevent or delay them from doing so.

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- **The National Planning Policy Framework should be amended to emphasise the key importance of the provision of housing for older people and the new standard approach to assessing need should explicitly address the housing needs of older people.**
- **To facilitate the delivery of new homes, specialist housing should be designated as a sub-category of the C2 planning classification, or be assigned a new use class.**
- **Councils should publish a strategy explaining how they intend to meet the housing needs of older people in their area and, in their Local Plans, identify a target proportion of new housing to be developed for older people along with suitable, well-connected sites for it.**

National and local planning policy should give greater encouragement to the development of housing for older people. Older people who wish to move should be able to choose from a wide range of housing to accommodate their needs and preferences. However, the evidence we heard suggested there was a shortage of desirable mainstream, accessible and specialist housing and bungalows in both the private and social sectors.

- 
- **All new homes should be built to the Category 2 Building Regulations standard so that they are ‘age proofed’ and can meet the current and future needs of older people.**
  - **The Government should accept the Law Commission’s code of practice and consider introducing sector specific legislation in order to promote consumers’ and lenders’ confidence in specialist housing.**

Accessible and specialist homes are a key to housing an ageing population. Specialist housing, particularly extra care housing, can promote the health and well-being of older people and their carers. However, concerns about the costs related to this type of housing and lenders’ reluctance to provide mortgage finance for specialist housing may prevent older people from purchasing this type of property.

- 
- **The social care green paper should consider the range of housing for older people, in particular the potential for extra care housing to play a greater role in providing social care alongside home care and residential care.**

The right kind of housing can keep older people healthy, support them to live independently and in the longer-term reduce the need for home care or residential care and lead to savings in health and social care budgets. The national strategy should take full account of this and be closely linked with the forthcoming social care green paper.

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# 1 Introduction

1. Our predecessor committee originally launched this inquiry in February 2017. Several days before the first oral evidence session was due to take place, the 2017 General Election was called and the inquiry closed pending the dissolution of Parliament. We decided to relaunch the inquiry in September 2017 and called for updates to the written submissions we had already published and new evidence from those who had not already contributed.

2. The decision to examine the issue of housing for older people was a consequence of our predecessor committee's inquiries on adult social care and capacity in the building industry. The evidence heard during these inquiries brought to the fore the facts that we have an ageing population with resultant health and care needs and a general shortage of homes. Our predecessors were rightly concerned to find out whether the housing on offer now and planned for the coming years would support the needs of older people.

3. This inquiry has revealed that housing for older people is a complex topic covering the situation for people who 'stay put' as much as those who move and what they move to. There are a range of issues involved from home maintenance and adaptations to the role of housing in health and social care integration. As the evidence of Care and Repair notes:

Just like any other age group, 'older people' are highly diverse. They may be rich, poor or somewhere in between. They may be healthy or have health problems, physical and/or mental. Their housing situations and the options open to them vary greatly dependent upon their tenure, geographical location, income and equity. Their personal situations — links with family, friends, neighbours, their interests, lifestyles and aspirations — are also diverse.<sup>1</sup>

With this in mind, we have sought to produce a report which reflects the diversity of older people in terms of their ages, their individual circumstances and their choices and preferences. This report considers the provision of advice and information on housing; the link between housing and health; the situation for people who 'stay put' and for those who move home; housing options and supply and, finally, the need for a national strategy. In the Housing White Paper, the Government stated its intention to explore the issues relating to housing for older people and find sustainable solutions to any emerging problems.<sup>2</sup> We hope that this report will feed into that process.

4. We are grateful to everyone who contributed to our inquiry. We received over 100 submissions and updates from local authorities, housing developers and providers, academics, think tanks and members of the public. The themes emerging from our written evidence were explored in five evidence sessions and supplemented with informal evidence from members of the public who contributed to our web forum and a survey of the members of Later Life Ambitions.<sup>3</sup> While we have all seen sheltered housing in our constituencies, we were keen to visit examples of specialist housing in the context of this inquiry and saw flats built to Lifetime Homes standards in Hounslow and extra care housing in Dunstable and Battersea. We are extremely grateful to Habinteg, the Associated Retirement Community Operators, LifeCare Residences and Central Bedfordshire

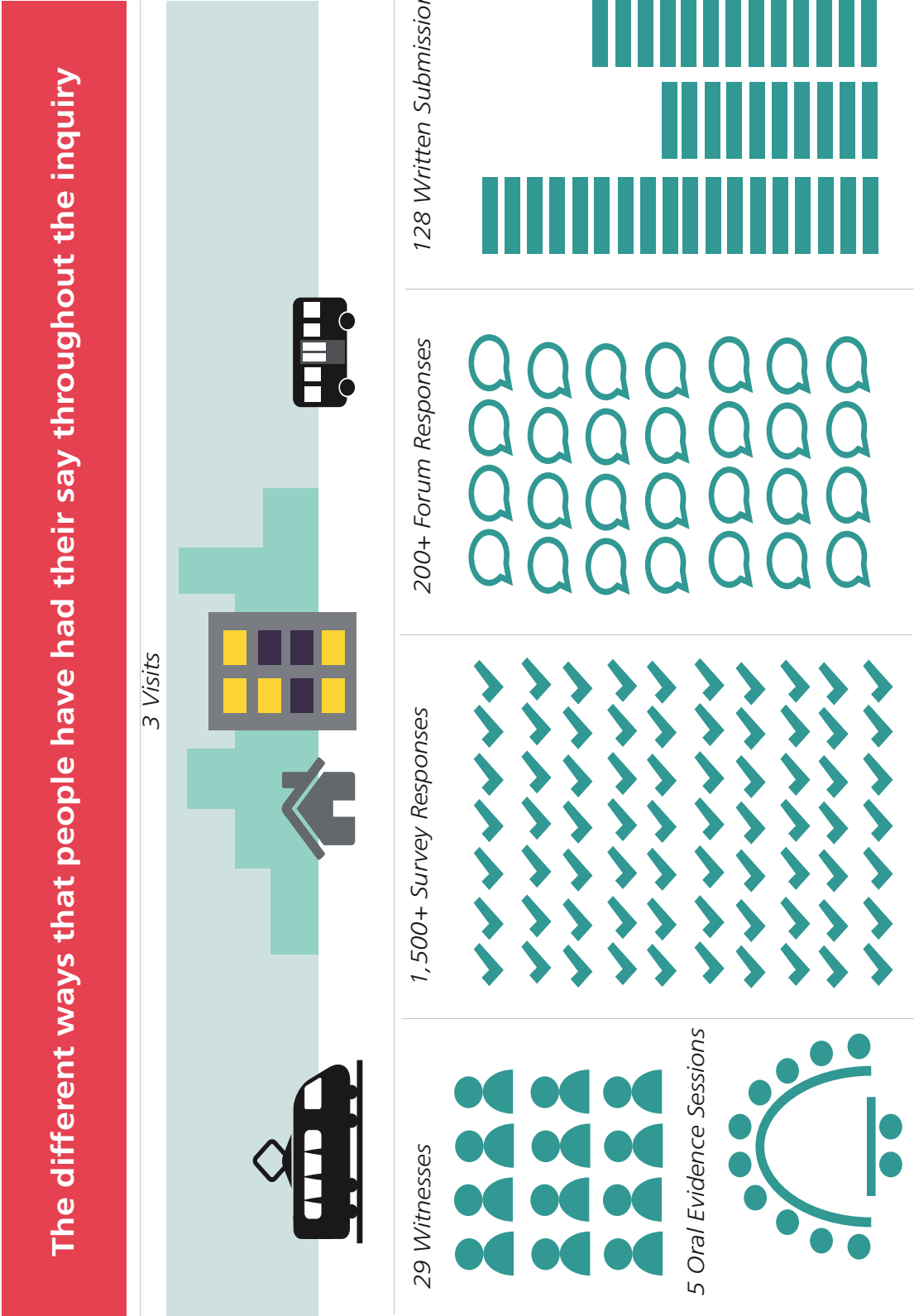
1 Care and Repair [[HOP 013](#)] para 2.3

2 MHCLG, [Fixing our broken housing market](#), February 2017

3 Later Life Ambitions [[HOP 036](#)]



Council for arranging these visits and to the residents who kindly showed us around their homes. Thank you also to our specialist advisor, Christine Whitehead, Emeritus Professor of Housing Economics at the London School of Economics and Political Science.



## 2 Advice and information

5. One of the concerns which was raised with us was the need for more advice and guidance for older people on housing. We have chosen to tackle this at the outset of this report, believing that it is fundamental to helping people make the right decisions about how they live in later life. The Elders Council of Newcastle said that “high-quality information” and independent trusted advice” were “key to older people making the best choices”.<sup>4</sup> Dr Brian Beach, Senior Fellow at the International Longevity Centre-UK (ILC), told us that people rarely made plans for later life, with most moving “in response to a health shock—the emergence of a care need in them or their partner”.<sup>5</sup> To enable and encourage people to start planning for later life, a group of relevant organisations in Greater Manchester recommended the creation of a “national ‘brand’ accompanied by “promotional campaigns”.<sup>6</sup>

6. We heard that older people can need advice on a wide range of sometimes complex topics. The L&Q Group, a large social landlord, said their tenants needed help with the moving process but also “broader information and advice [on] housing, care/support, financial and benefits matters”.<sup>7</sup> Claudia Wood, the Director of Demos, explained that older people’s personal and financial circumstances, which included pensions, equity release and paying for care, meant they often required expert advice on housing finance.<sup>8</sup> John Galvin, Chief Executive of the Elderly Accommodation Counsel (EAC), told us that people often needed help to navigate the retirement housing sector:

There are a huge range of models [ ... ] pricing arrangements [ ... ] service charges and services that are provided. There are big differences between those. Even if you have read everything, it is quite a big job to work out “What can I afford? What model would work best for me?”<sup>9</sup>

Despite this clear need, Jeremy Porteus, Director of the Housing Learning and Improvement Network, said that there was a “deficit of really good quality access to information and advice”.<sup>10</sup> Based on her anecdotal experience, Sue Adams, the Chief Executive of Care and Repair, said there had been a shift in the delivery of advice from face-to-face to online.<sup>11</sup> We note that there is a significant amount of comprehensive guidance online, notably from Age UK, HousingCare.org and local councils, however Ms Adams highlighted the fact that 59% of over 75s do not use the internet.<sup>12</sup> John Galvin said that online advice was also problematic for people who do not read well or do not have English as a first language. He said that, after a certain point, even those who are adept at using the internet valued receiving advice in person from someone who could “filter down the number of options”.<sup>13</sup>

7. John Galvin’s organisation, the EAC, leads the FirstStop Advice Service whose trained advisers provide older people with advice on housing, care and finance by telephone, in

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4 Elders Council of Newcastle [\[HOP 033\]](#)

5 Q3

6 Manchester Metropolitan University and others [\[HOP 053\]](#)

7 L&Q-East Thames [\[HOP 084\]](#)

8 Q14

9 Q164

10 Q4

11 Q63

12 Q63

13 Q164

writing and online.<sup>14</sup> He explained that FirstStop was “the constant ringleader, hand-holder, or case-holder [ ... ] doing the initial conversations and pulling in expertise when it is needed”<sup>15</sup> and had created partnerships with “locally known and trusted agencies” who could help people living nearby.<sup>16</sup>

8. We learnt that FirstStop had been part-funded by the then Department for Communities and Local Government (DCLG) from April 2009 until December 2016. The then Local Government Minister, Marcus Jones, told us that “funding is currently being provided to FirstStop by a number of external organisations: Legal & General and Nationwide Building Society are two such organisations”<sup>17</sup> and the then Housing Minister, Alok Sharma, said that the Big Lottery has also provided funding.<sup>18</sup> We have since received a letter from the Chief Executive of the EAC clarifying which organisations funded the service and over what period of time.<sup>19</sup> It confirms that, of the organisations named by the Minister, only Nationwide is currently providing funding. The joint submission from the Housing LIN and the EAC explained the consequences of the DCLG funding having ceased:

At its peak in 2015–16, FirstStop reached 20,000 clients via local outlets, 20,000 via its national advice line and 4 million via its website. Despite clear and independently evaluated evidence of its impact in terms of individual wellbeing, savings to health and social care budgets, and facilitating downsizing, DCLG’s decision to stop funding has led to a very substantial reduction in FirstStop Advice’s capacity to provide personal advice, guidance and support.<sup>20</sup>

9. We asked the Local Government Minister why the Department stopped funding a service which provided help and advice to people taking a major life decision. We were pleased to hear him say that the Department needed to “explore how [advice] is going to be delivered and how it can be sustained”.<sup>21</sup>

**10. Access to good quality information and advice is fundamental to helping older people make informed, planned and timely choices about how and where they live in later life, and to helping them to live healthily and comfortably wherever they choose to do so and to make the most of their financial resources.**

**11. *We believe that the FirstStop Advice Service currently led by the Elderly Accommodation Counsel (EAC) should be expanded. Although we acknowledge that there is a considerable amount of useful advice available online, we are concerned that this is not accessible to many older people who may require information and advice in person. We recommend that the EAC should be re-funded by the Government to provide an expanded national telephone advice service (referred to from now on as “the national advice service”), supported by advice online, in hard copy advice and other accessible formats. Advice provided should be holistic, covering the range of issues relating to housing for older people (examined in subsequent chapters of this report) as follows:***

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14 [www.firststopcareadvice.org.uk](http://www.firststopcareadvice.org.uk)

15 Q165

16 Q166

17 Q257

18 Q261

19 John Galvin letter

20 Housing Learning and Improvement Network (LIN) and Elderly Accommodation Counsel (EAC) [[HOP 012](#)]

21 Q257

- *Repairs, maintenance and adaptations, and access to funding for these;*
- *Home improvement agencies (HIAs), handypersons, trusted traders;*
- *Heating and energy efficiency;*
- *Housing options, including specialist housing;*
- *Moving home, including the practical and financial aspects of moving;*
- *Care options and financing of care; and*
- *Signposting to appropriate agencies for advice on housing finance: mortgages, equity release, Help to Buy and shared ownership (for example, the single financial guidance body).*

12. *The national advice service should maintain and extend its links with local authorities, HIAs and other local charities and partners so it can direct people to advice and practical help locally. Furthermore, the national advice service, and the linked organisations, should be consistently branded and advertised by a Government-backed campaign to raise awareness and promote the creation of a 'trusted network'.*

### 3 The link between housing and health

13. The quality of housing is a key determinant of health and wellbeing. Professor Carol Holland of the Centre for Ageing Research at Lancaster University identified three housing-related factors impacting on health: cold, the risk of falls and the location of the home.<sup>22</sup> In this chapter, we consider each of these in turn. In chapter four, we discuss what needs to happen to ensure older people live comfortably and healthily in their mainstream home. In chapter six, we discuss the health benefits of specialist housing.

#### Cold and keeping warm

14. The 2017 annual fuel poverty statistics show that, since 2013, the proportion of households aged 75 and over in fuel poverty has been increasing.<sup>23</sup> The evidence we heard supported this. Jeremy Porteus of the Housing LIN said that, for some “asset-rich but cash-poor” older people, it could be a choice of “heat or eat.”<sup>24</sup> Sue Adams of Care and Repair pointed out that older people, particularly the “older old”, are at home longer and, therefore, need to heat it for longer. She said that, for a significant proportion of older people:

It is a question of cost. On the other side is the efficiency of the home. [ ... ] you get this combining of factors, where a proportion of the older population, who are at home more, are in homes that are harder to heat and on incomes that make it more difficult to afford those heating bills.<sup>25</sup>

The impacts of living in a cold home on a person’s physical and mental health can be severe. Professor Holland explained that there was a well-evidenced link between cold homes and chronic diseases, such as respiratory and cardiovascular diseases and rheumatoid arthritis, and poor mental health.<sup>26</sup> We also heard from Sue Adams in an earlier evidence session that cold homes were connected to acute cases, namely “heart attacks, strokes and falls”.<sup>27</sup>

15. There are various public and private initiatives, for example the Winter Fuel Allowance, the Warm Homes Discount Scheme and the Energy Company Obligation, providing heating and insulation measures to vulnerable householders in receipt of certain benefits. In addition, the Energy Saving Trust is contracted by the Department of Business, Energy and Industrial Strategy to run a telephone advice service (the Energy Saving Advice Service) offering impartial energy saving advice to householders in England and Wales. In Northern Ireland and Wales, the Affordable Warmth Scheme targets support at households most affected by fuel poverty. The scheme takes a whole house approach to home energy efficiency improvements (insulation, draughtproofing, upgrading heating systems, double-glazing windows) and works in partnership with local authorities to identify households in need of help.

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22 Q194

23 BEIS, [Annual fuel poverty statistics report](#), 2017 (2015 data), June 2017

24 Q40

25 Q61

26 Q194

27 Q61

16. For older people, living in a cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression. This has resultant costs to the NHS and social care. The problem is exacerbated by the fact that older people spend longer at home and may be living on a low income in homes that harder to heat. *We recommend that the national advice service should partner with and signpost older people to the Energy Saving Trust's telephone advice line. In addition, we recommend the Government consider developing a national scheme to help older people in fuel poverty and, as part of this, it may wish to consider schemes similar to the Affordable Warmth Scheme in Northern Ireland and Wales.*

## Falls

17. The second housing and health related factor identified by Professor Holland was falls resulting from hazards in the home, for example, raised thresholds and loose carpet. She said that 75% of the deaths related to falls happened in the home and they represented between 10% and 25% of ambulance calls to older adults.<sup>28</sup> Falls can also precipitate serious decline in an older person and necessitate a move into long-term nursing or residential care.<sup>29</sup> We noted in particular Sue Adams' evidence that "A fall tends to be the trigger point at which people start to lose capacity. It's not just the physical impact but the psychological impact".<sup>30</sup> Jacquel Runnalls, Co-opted Lead on Accessibility and Inclusive Design at the Royal College of Occupational Therapists Specialist Section in Housing, said that there was "increasing recognition of falls" and, accordingly, "some local authorities or health services have falls prevention teams".<sup>31</sup> A recently published evidence review on home adaptations by the Centre for Ageing Better found "strong evidence that minor home adaptations are an effective and cost-effective intervention for preventing falls and injuries".<sup>32</sup> We discuss getting help with adaptations in paragraphs 33 to 35 and the Disabled Facilities Grant in paragraphs 40 to 45.

18. **The consequences of falls at home caused by often trivial hazards (we consider how these can be prevented in the next chapter) can be catastrophic, precipitating serious decline in older people's physical and mental health. *There needs to be a national and local drive to address falls and accidents in the home. This should include provision of better advice and information about repairs, maintenance and adaptations (paragraph 11), wider access to the services of Home Improvement Agencies and handypersons to facilitate adaptations (paragraph 34) and more timely implementation of, and flexible use of, Disabled Facilities Grants (paragraph 43). In addition, integrated working on health and social care should include working with housing partners to identify homes with falls and accidents risks and intervening to remove them.***

## Location of the home and loneliness

19. Professor Holland explained that the location and the environment outside the home can affect physical and mental health in the following ways:

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28 Q194

29 Centre for Ageing Better [[HOP 046](#)]

30 Q67

31 Q200

32 Centre for Ageing Better, [The role of home adaptations in improving later life](#), November 2017

If you are in a home that is completely inaccessible to your friends or relatives, or there is no bus service, and your environment outside the home is not age friendly, you are going to be isolated. You are going to struggle to get a healthy diet because you cannot get to the shops properly. You are not going to be physically active, because it is too difficult to get out and about in your environment. Maybe there is no bench between you and the shop, when you could walk as long as there was a bench or toilet there.<sup>33</sup>

Jacqueline Runnalls of the Royal College of Occupational Therapists said that being physically active was linked to independent living, general resistance to illness and good mental health, and loneliness and social isolation were associated with mortality.<sup>34</sup> We note that the contributors to our web forum often said that they prized being near local amenities and public transport networks. We received a significant amount of evidence about the social and community aspects of living in specialist housing, where residents have communal areas in which to socialise. In 2015, the International Longevity Centre-UK surveyed residents of extra care housing on their independence, loneliness, and quality of life, finding that:

Our respondents reported lower loneliness than those in the community, giving some reason to believe that housing with extra care plays a role in reducing loneliness among its residents compared to what might be experienced if they stayed in the community.<sup>35</sup>

We look at the health and wellbeing benefits of specialist housing in paragraphs 87 to 92.

**20. Social isolation can lead to poor mental and physical health. Ensuring that older people's housing is within easy reach of local services, amenities and public transport links is therefore critical, and we consider the location of new housing for older people further in paragraph 117. Loneliness is harder to tackle. We support the recommendations of the Jo Cox Commission's Call to Action,<sup>36</sup> including a UK wide Strategy for Loneliness across all ages and a programme to develop the evidence around 'what works' in tackling loneliness, and welcome the Government's recent appointment of a 'Minister for Loneliness'.**

## The costs of poor housing

21. Poor housing clearly results in costs to the health service. Reference was often made to research by the Building Research Establishment (BRE) in 2016 which estimated the costs of poor housing to the NHS as £1.4 billion per annum.<sup>37</sup> A further analysis of the BRE's data by Care and Repair showed that nearly half this amount (£624 million) arose from poor housing among older people.<sup>38</sup>

22. Furthermore, poor housing can delay discharge home from hospital which is costly both to patients' health and wellbeing and to the NHS. NHS providers' audited accounts

33 Q206

34 Q195

35 International Longevity Centre-UK [[HOP 079](#)]

36 Jo Cox Commission on Loneliness, [Combatting loneliness one conversation at a time: A call to action](#), undated

37 See, for example, Housing LIN and EAC [[HOP 012](#)]; Centre for Ageing Better [[HOP 046](#)]; Elders Council of Newcastle [[HOP 033](#)]; Care and Repair [[HOP 013](#)]

38 Care and Repair, [Off the Radar: Housing disrepair & health impact in later life](#), March 2016



for 2016–17 estimated that delayed transfers of care cost providers £173 million, but, in its report on the accounts, NHS Improvement stated that the full costs were likely to be much higher.<sup>39</sup> Gill Moy, Director of Housing and Customer Services at Nottingham City Homes, said her organisation's Hospital to Home project found a place in an independent living scheme for a gentleman whose transfer home from hospital was delayed by 30 weeks because his home was not suitable for him to return to. She said the project was:

Partly conceived to reduce delayed transfers of care, but it spends a lot of time concentrating on early intervention/prevention. Housing has a massive role to play in that early intervention/prevention agenda, so preventing people from going into hospital in the first place, but then trying to prevent readmission.<sup>40</sup>

With regards to hospital readmissions, Jacquell Runnalls of the Royal College of Occupational Therapists explained that the risk of this was higher from a home that is unsafe, cold and poorly insulated.<sup>41</sup>

**23. There is a well-evidenced link between housing and health and wellbeing, and the consequent costs of treatment by the health service. Poor quality, un-adapted, hazardous, poorly heated and insulated accommodation can lead to reduced mobility, depression, chronic and acute illness and falls and social isolation to loneliness and depression. We recommend that prevention, early intervention and promotion of health and wellbeing through housing should be a priority for the national advice service. It should refer people to where they can get practical help to improve the quality of their home and to their local authority and health service if more immediate, direct intervention is needed.** In this context, we note that Karen Buck MP's Homes (Fitness for Human Habitation and Liability for Housing Standards) Bill 2017–19, currently before the House, would help to resolve some of these issues for tenants. The Bill seeks to require that residential rented dwellings in England are fit for human habitation at the start of the tenancy and thereafter.<sup>42</sup>

## Housing, health and social care

24. Health and social care integration aims to overcome organisational, legal and regulatory boundaries between the sectors to ensure that patients receive cost-effective care when and where they need it. In most cases, this involves closer working between health and social care services. The Department of Health, the then DCLG and NHS England have made various commitments to integration over the years<sup>43</sup> and, in 2015, NHS England established 44 sustainability and transformation 'footprints', requiring local health bodies to draw up sustainability and transformation plans, now called partnerships (STPs), to improve services and finances over the five years to March 2021. In

39 NHS Improvement, [Performance of the NHS Provider Sector year ended 31 March 2017](#), June 2017

40 Q195

41 Q196

42 [Homes \(Fitness for Human Habitation and Liability for Housing Standards\) Bill 2017–19](#)

43 The Better Care Fund (created in 2013, requiring local health bodies and local authorities to pool existing funding and produce joint plans for integrating services), the Integrated Care and Support Pioneers Programme (2013) and the Five Year Forward View (2014).



March 2017, it was announced that ten STPs would evolve into Accountable Care Systems (ACS) in which NHS organisations and local councils would collaborate more closely on the provision of care.<sup>44</sup>

25. Because of the public health consequences of unsuitable housing, the need to integrate housing services with health and social care services, or for these services to work together more closely, has been recognised. The care and support statutory guidance states that “The suitability of living accommodation is a core component of an individual’s wellbeing and when developing integrated services, local authorities should consider the central role of housing within integration, with associated formal arrangements with housing and other partner organisations”.<sup>45</sup> A 2014 NHS England and Department of Health backed national Memorandum of Understanding set out a shared commitment to joint action across government, health, social care and housing to deliver better health and wellbeing outcomes and, among other things, aimed to enable “improved collaboration and integration of healthcare and housing in the planning, commissioning and delivery of homes and services”.<sup>46</sup> However, the evidence we heard suggested that housing services were not routinely integrated with health and social care services. The Housing LIN said that housing, particularly older people’s housing, needed to be “placed firmly in the health and adult care arena to maximise the benefits from the housing sector to the wider service integration agenda”.<sup>47</sup> Gill Moy of Nottingham City Homes said that, while Nottingham’s STP included housing, that was “not replicated across the country”.<sup>48</sup> She went on to describe the benefits of closer working between housing, health and social care which included housing officers being able to make referrals for care and support, promote the health agenda among their tenants and facilitate hospital discharge. Our predecessor Committee considered the operation of the Disabled Facilities Grant in its inquiry on adult social care and found that its administration and operation was hampered by the split in responsibility between district and county councils.<sup>49</sup> This tier split may also hamper closer working between health, social care and housing.

**26. The need to integrate housing services with health and social care services has been recognised in the care and support statutory guidance and the Department of Health, Ministry of Housing, Communities and Local Government and NHS England supported 2014 Memorandum of Understanding to support joint action on improving health through the home. *We believe that, given the health consequences of unsuitable housing, this should be reflected better at local level. Housing services should take equal status to health and social care services in the planning and implementation of closer working and in Sustainability and Transformation Partnerships (STPs) and Accountable Care Systems (ACSs). The Government should monitor the extent to which STPs and ACSs include plans for closer working between housing, health and social care organisations and include mechanisms to address housing issues having a direct impact on residents’ health outcomes. The Government should, where necessary, make representations to such organisations to ensure that housing is included in STPs and ACSs.***

44 NHS, [Next steps on the NHS Five Year Forward View](#), March 2017

45 DHSC, [Care and support statutory guidance](#), updated August 2017 (para 4.91)

46 DHSC, [A Memorandum of Understanding \(MoU\) to support joint action on improving health through the home](#), December 2014

47 Housing LIN and EAC [\[HOP 012\]](#)

48 Q217

49 Communities and Local Government Committee, [Adult social care: Ninth Report of Session 2016–17](#), March 2017

27. On the interface between housing and social care, we heard that some local authority social services teams were not routinely considering extra care housing, where onsite care and support is included, as an alternative care option to domiciliary or residential care.<sup>50</sup> Yet it is an important option. Professor Holland said that her evaluation of extra care housing had found that people who were frail and living with dementia could be cared for appropriately in this type of scheme, highlighting that “residential care, and especially nursing care, would be far more expensive”.<sup>51</sup> Jeremy Porteus of the Housing LIN said that “at least one third of people moving into residential or nursing care could potentially be offered either extra care or social housing”.<sup>52</sup> Age UK said that the planned social care green paper needed to consider older people’s housing, including the need to help older people adapt their own homes and build accessible housing.<sup>53</sup> We were pleased that the then Local Government Minister said “the social care green paper itself will look at issues around housing when it comes to older people”.<sup>54</sup> **The right kind of housing can keep people healthy, support them to live independently and reduce the need for home care or residential care. The social care green paper, planned for publication in summer 2018, must consider the range of housing for older people, from mainstream and accessible homes to supported and extra care housing, as well as access to adaptations and repairs. In particular, the social care green paper should consider the role of extra care housing in the provision of social care alongside domiciliary and residential care.**

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50 Q54

51 Q216

52 Q54

53 Age UK [[HOP 085](#)]

54 Q238

## 4 Staying put

28. When we asked our witnesses how most older people lived, we were told that the majority lived in “ordinary housing, whether as owner-occupiers, social tenants or private rented tenants”.<sup>55</sup> According to research by the Joseph Rowntree Foundation in 2012, 93% of older people live in mainstream housing.<sup>56</sup> We believe that the size of this group, and the issues relating to ageing in mainstream housing, mean it deserves particular attention.

29. Older people ‘stay put’ for different reasons. A survey in 2015 of 1389 people aged 50 or over by the Centre for Ageing Better found that “most people in later life do not intend on moving and wish to continue to live in their own homes for as long as possible”.<sup>57</sup> One contributor posted the following comment on our web forum, revealing some of the reasons why people wish to ‘stay put’:

I do not plan on ever moving from my home—I lived here with my late husband who had Alzheimer’s and died 8 years ago at home [ ... ] I love my patio garden—although I drive—I have shops and a bus stop easily within walking distance. People say why don’t I move somewhere smaller but I love my home and think that is a good enough reason to stay where I am.

30. Some people who would like to move stay put, often because of the costs of moving and the difficulty of finding a suitable new home (we consider the barriers to moving in chapter five and the availability of different housing options in chapter six). Foundations, the national Body for Home Improvement Agencies, pointed out that, given the supply of specialist housing (considered at paragraphs 85 to 86), mainstream housing had to play a significant role in housing older people:

With people over 65 growing by 155,000 every year and accounting for 74% of total household growth to 2037, the current 2.8% of retirement housing under construction as a percentage of all housing under construction would require an unprecedented and likely to be unachievable rise. Appropriate accommodation can therefore only be created in the general housing stock both existing and under construction.<sup>58</sup>

### Ageing in mainstream housing

31. Given most older people live in mainstream housing, something which is likely to continue, Sue Adams of Care and Repair said it had a “pivotal role [ ... ] in ageing well, healthily and safely”.<sup>59</sup> We heard, however, that heating the home and keeping it in a healthy and safe condition can be a struggle for many older people, 78% of whom are owner occupiers meaning maintenance and repair falls to them alone.<sup>60</sup> The Decent Homes standard is a nationally defined standard measured by indicators, including need for urgent repairs, age of the kitchen and bathroom facilities and thermal comfort, as well as ‘Category 1 hazards’ (most commonly risks of falls and excess cold). Research by Care and Repair found that, in 2012, 79% of households aged 65 years or over who were

55 Q2

56 JRF, [Older people’s housing: choice, quality of life, and under-occupation](#), May 2012

57 Centre for Ageing Better [HOP 046]

58 Foundations [[HOP 011](#)]

59 Q60

60 Q61

living in a non-decent home were owner occupiers and 85% of homes found to contain a Category 1 hazard were owner occupied.<sup>61</sup> Sue Adams explained why older home owners often struggled:

There is an issue around the affordability of the ongoing maintenance of a home among lower-income groups. Even for people in the middle, where they might have some money to do the work—especially older and single people, which is the profile of many Care and Repair service users—there is a massive issue around trust and worry. You have got the affordability of the repair, and then there is the thought, “I know that this needs doing, but how on earth do I go about it? How do I get an affordable and good job?”<sup>62</sup>

32. In addition, older home owners and tenants may need to make adaptations to their mainstream homes: 27% of older people have some form of adaptation installed.<sup>63</sup> Adaptations may be small, such as adding grab rails, or more substantial, such as installing a wet room or a stairlift. One contributor to our web forum said that various adaptations to her mother’s home, “grab rails, walking aids, rise and recline chair, commode, wet room, hospital bed and electric moving mattress”, meant that she was able to continue living in familiar surroundings with Alzheimer’s disease. The Disabled Facilities Grant, which we consider at paragraphs 40 to 45, funds adaptations for those who are eligible.

## Practical help with maintenance, repairs and adaptations

33. Given the evidence discussed in chapter three on the link between housing and health, we now consider what needs to happen to ensure those who stay put have access to help to keep their homes comfortable, healthy and safe. Reflecting the evidence received, this section focuses on the situation for older owner occupiers (we consider the role of registered social landlords in paragraphs 89 to 90). Foundations, the national body for Home Improvement Agencies (HIAs), explained that HIAs helped older people to “stay safe, secure and warm and retain independence in their own home”, through the provision of a range of services, including adaptations, energy efficiency measures and handypersons services.<sup>64</sup> Claudia Wood of Demos said:

The handyperson idea is very important [ ... ] A lot of older people just need their lightbulbs changed. When you are in your 70s, you cannot climb up a ladder to change your lightbulb, so you end up sitting in the dark. Then there is the risk of falls and you break your hip, and onwards and upwards. Some of that low level stuff is very cheap.<sup>65</sup>

We heard about the popularity of handyperson services among older people and that, by helping people to make improvements and repairs to their home, they allowed them to feel “independent and in control”.<sup>66</sup>

34. However, HIAs can also help older people to make their home safe, performing safety and falls risk checks and removing hazards where needed and facilitating hospital

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61 Care and Repair, [Off the Radar: Housing disrepair & health impact in later life](#), March 2016

62 Q61

63 Foundations [[HOP 011](#)]

64 Foundations [[HOP 011](#)]

65 Q34

66 Q66

discharge. Care and Repair said that it cost, on average, £756 to remove a Category 1 falls hazard and £4,344 to remove an excess cold hazard.<sup>67</sup> However, as discussed above, the cost of falls and cold to an older person's health and wellbeing are much greater, as are the costs to the health and social care service of treating the consequences. Therefore, the evidence from the Elders Council of Newcastle that these services had "suffered in the last few years" concerned us.<sup>68</sup> A contributor to our forum said that his local scheme, which had been excellent, had been disbanded. Sue Adams of Care and Repair also believed that there had been a "contraction" in these services with the result that their "focus is on adaptation and what is disappearing is people to turn to with help for repairs".<sup>69</sup> **We believe that this is a false economy. Home Improvement Agencies and handyperson services are good value for money, contributing to keeping older people healthy, safe and independent at home. The Government should make additional funding available for the expansion of Home Improvement Agencies so that there is at least access in each local authority area to one agency which operates a full range of services, including a handyperson service.**

35. Many people will approach a local private trader for help with repairs, maintenance and adaptations, and this is increasingly likely to be the case in the context of the reduced availability of handyperson services. In the case of home adaptations, Claudia Wood of Demos said:

A lot of older people do not necessarily know about the Disabled Facilities Grant (DFG), are not eligible for the DFG or do not want to go through the paperwork and then a year's wait. They will go and buy their own and get someone in to do the work [ ... ] There are registers and organisations that promote safe handymen, rather than whoever just coming off the street.<sup>70</sup>

However, we are mindful of the evidence cited earlier that older people can find securing a tradesperson they trust particularly worrisome. A contributor to the web forum said he valued the fact that his local scheme vetted their handypeople having had to deal with a rogue tradesman in the past. **Current schemes which check and endorse tradespeople, such as the Government endorsed scheme, 'TrustMark', should consider developing a specific accreditation for traders who have been reviewed by older people or their relatives and proven to be trusted. Once accredited, the trader would be permitted to display the branding used by the national advice line and linked organisations alongside their own logo.**

## Financing maintenance, repairs and adaptations

36. Councils administer the Disabled Facilities Grant (DFG) and may also provide some financial assistance for home repairs, improvement and adaptations, and housing associations carry out repairs and adaptations work on their own stock. We were interested to hear about the potential for lower income older owner occupiers to use equity release for funding repairs, adaptations and maintenance. The Equity Release Council (ERC) said that it can play a "crucial role in enabling older people to remain in their own homes",<sup>71</sup>

67 Care and Repair [HOP 013]

68 Elders Council of Newcastle [HOP 033]

69 Q63

70 Q39

71 Equity Release Council [HOP 023]

citing analysis by insurers LV= which found that 31% of equity release products taken out in 2016 were used to fund home improvements. John Galvin of the Elderly Accommodation Council confirmed this:

Something that we see a lot of [ ... ] is people who want to stay living where they are, need or want major adaptations, find that either a Disabled Facilities Grant is not available to them, or processing it could take a long time. They accept that they are going to have to pay themselves, but do not have the ready cash. Equity release is a way of doing that.<sup>72</sup>

John Godfrey, Corporate Affairs Director at Legal and General, gave us the following example of how his organisation, in partnership with a not-for-profit organisation, had helped someone in this way:

We had a gentleman who lives in Islington, Mr B; I will not give you his name. He is in his 70s, suffers from autism, and was living in a property in absolute squalor, basically. The place was falling down around him, and he was living in a corridor, the other rooms all having become uninhabitable. The approach for him was clearly not to try to sell it, because the property was worth about £350,000 at the outset, such was the state of it, but, as he owned the house, to take out some of his equity and use the equity to refurbish the house, which is now valued at about £600,000. He lives in it, it is habitable, and he no longer faces a binary decision of being placed in residential care by social services, who of course, cannot step in and refurbish his house for him at a cost of £150,000.<sup>73</sup>

37. The British Property Federation said that, while there had been “reputational concerns” and “a lack of consumer protection” around equity release in the past, ERC and Financial Conduct Authority regulation have helped to “provide assurances to consumers that they are entering into a fair contract”.<sup>74</sup> Indeed, products offered by members of the ERC contain protections, including a ‘no negative equity guarantee’ and the right to remain in the home until the end of the customer’s life or their move into long-term care.<sup>75</sup>

38. However, Mark Bogard, Chief Executive of the Family Building Society, said that “a normal mortgage can be a much more suitable product” for some older people<sup>76</sup> but, because of the separation in the market between normal and lifetime mortgages, it was not usually possible to get advice on both products from one advisor.<sup>77</sup> Paul Smees, Head of Mortgages at UK Finance, said that he believed there was a “challenge for the industry” to make obtaining advice as “seamless as possible”.<sup>78</sup>

39. **Equity release and re-mortgaging are possible routes for older owner occupiers to fund large repairs or adaptations to their homes. Mortgage providers and members of UK Finance and the Equity Release Council should work to ensure these products are tailored to the needs of older people.** We make a specific recommendation on the provision of joined up advice on equity release and mortgages in paragraph 60.

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72 Q181

73 Q159

74 British Property Federation [[HOP 062](#)]

75 Equity Release Council [[HOP 035](#)]

76 Q175

77 Q164

78 Q185



### *The Disabled Facilities Grant*

40. Disabled Facilities Grants (DFGs) are means-tested grants available to disabled people who need to adapt their home to enable them to live there independently, for example installing a stairlift or creating a downstairs bathroom. Older people over 60 are the main recipients of the DFG, receiving 71% of the grants made.<sup>79</sup> In 2014, the DFG was channelled into the Better Care Fund in line with its aims of joining up services to reduce hospital and care home admissions and enabling people to return from hospital more quickly. In recognition of the rising need for adaptations, the Government provided a welcome increase in funding for the DFG in the 2015 Spending Review to £500 million by 2019–20<sup>80</sup> and provided an additional £42 million in 2017–18 in the Autumn Budget 2017.<sup>81</sup>

41. Our predecessor Committee considered the operation of the DFG in its inquiry on adult social care, concluding that it was “slow and cumbersome”,<sup>82</sup> so we were interested to return to the issue. Once again, we heard that it was a “clunky process”<sup>83</sup> and that waiting times for implementation varied significantly between local authorities, ranging from days and weeks in some places to two or three years in others.<sup>84</sup> The Local Government Association highlighted best practice in South Staffordshire where councils and third sector organisations were working together to streamline DFG applications, assessments and provision, resulting in a “a reduction in costs of 40% and huge cuts in waiting times”.<sup>85</sup>

42. Our attention was also drawn to the limit of the DFG, set in 2008 to £30,000, by Jacquel Runnalls, Co-opted Lead on Accessibility and Inclusive Design at the Royal College of Occupational Therapists Specialist Section in Housing, who said:

Most adaptations that help people to remain in their own home are around £7,000. If you are looking at somebody remaining in a property that is not generally accessible, you are probably looking at adapting ground floor living. If it is a house, for example, you might ramp the front entrance, and you may have to extend the rear of the property to accommodate a bedroom and a wet room bathroom. You need to think about carers as well, so you need the space. And £30,000 does not go a long way to accommodate that.<sup>86</sup>

Ms Runnalls also highlighted the fact that, under The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002, local authorities may use the DFG in a “flexible, preventative way”, and she listed the possible uses: “delayed discharge and step-down flats, but particularly handypersons, repair schemes and fuel poverty and energy efficiency initiatives. Some look at relocation grants”.<sup>87</sup> However, she also cited research by Foundations, which leads on the improvement of DFG delivery in England, that only 47% of local authorities have a policy to use the DFG in this way.

79 Foundations, [The Disabled Facilities Grant Before and after the introduction of the Better Care Fund](#), June 2016

80 HM Treasury, [Spending Review and Autumn Statement 2015](#), November 2015

81 HM Treasury, [Autumn Budget 2017](#), November 2017

82 Communities and Local Government Committee, [Adult social care: Ninth Report of Session 2016–17](#), March 2017

83 Q35

84 Q74

85 Local Government Association [[HOP 027](#)]

86 Q205

87 Q205

43. Based on the evidence it had heard, our predecessor committee recommended that the then DCLG should review the operation of the DFG. We were therefore very pleased that the then Housing Minister, Alok Sharma, announced before the Committee that a review of the DFG would take place shortly and would look at “criteria, eligibility and how funding is made available to local authorities”.<sup>88</sup> **The DFG has a very important role to play in making older people’s homes accessible and enabling them to maintain their independence. We welcome the Department’s commitment to review the operation of the DFG and recommend the review should also look specifically at:**

- *Ensuring that adaptations are implemented within a reasonable period of time;*
- *How to encourage local authorities to innovate in their approach to implementation; and*
- *The level at which the cap is set.*

## Older people in the private rented sector

44. One concern which was raised with us was the difficulties that private rented sector tenants have in securing adaptations from their landlord. In 2015–16, 17% of people over the age of 55 lived in private rented housing.<sup>89</sup> An Age Friendly Borough consultation run by Southwark Council revealed that many landlords were reluctant to allow adaptations because of the negative impact on the value of the property.<sup>90</sup> The then DCLG’s Adaptations and Accessibility Report 2014–15 confirms this: of the 45% of households that lacked one or more of their required adaptations, 10% did not have them because their landlord would not pay for them and 5% said that their landlord would not allow them.<sup>91</sup> Julia Park, Head of Housing Policy at Levitt Bernstein, pointed out that this problem was likely to increase as the numbers of older people privately renting are growing. Indeed, Generation Rent said that, between 2005–06 and 2015–16, the number of households privately renting in the 45–54 and 55–64 age groups increased from 403,000 to 1,114,000.<sup>92</sup>

45. **Private renting is an increasingly important housing option for older people and they should feel confident in being able to adapt their home to meet their needs. We recommend that the review of the DFG should consider how to ensure that older tenants in the private rented sector secure the adaptations they need. In particular, it should consider the case for allocating government funding to local authorities to make discretionary payments to landlords for the costs of reinstatement or removal of the adaptation once the tenancy has ended.**

46. Furthermore, we heard that, in terms of the condition of the home, the “worst housing” was in this sector.<sup>93</sup> The 2015–16 English Housing Survey found that the private rented sector had the highest proportion of non-decent homes at 28%, and Gill Moy, Director of Nottingham City Homes, said that a stock survey had shown that 21% of the privately

88 Q245

89 DCLG, [English Housing Survey 2015 to 2016](#), March 2017

90 Southwark Council [[HOP 056](#)]

91 DCLG, [English Housing Survey 2014 to 2015: Adaptations and Accessibility Report](#), July 2016

92 Generation Rent [[HOP 057](#)]

93 Q65



rented stock in Nottingham had a category 1 hazard.<sup>94</sup> Age UK said that large parts of the sector were “certainly inadequate for older people”.<sup>95</sup> The health consequences of poor housing are serious. We will be considering the quality of homes in the private rented sector in more detail in our separate ongoing inquiry on the subject. We also note Karen Buck MP’s Homes (Fitness for Human Habitation and Liability for Housing Standards) Bill 2017–19, currently before the House, which seeks to require that residential rented dwellings in England are fit for human habitation at the start of the tenancy and thereafter.<sup>96</sup>

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94\* Q194

95 Age UK [[HOP 085](#)]

96 [Homes \(Fitness for Human Habitation and Liability for Housing Standards\) Bill 2017–19](#)

## 5 Moving home

47. Aware that they may have lived in their current home for many years and seen their family grow up there, we wanted to know how many older people were interested in moving home. Claudia Wood of Demos, who has published research on this issue in recent years, said:

Various bits of polling have been done over the years [ ... ] It consistently comes up with roughly the same sort of percentages we are talking about. The estimate is that between a quarter and a third of older people are interested [ ... ] It is just under 3 million people in all.<sup>97</sup>

Dr Beach of the International Longevity Centre-UK said that polling he had conducted confirmed that around a third of older people wanted to move.<sup>98</sup> There are various reasons why people want to move home in later life; for example, their home may have too many stairs, too big a garden and require too much maintenance and upkeep.<sup>99</sup> These issues were frequently cited by contributors to our web forum, along with health reasons and wanting to be nearer their family. United for All Ages said that, of those making enquiries to their website<sup>100</sup> about moving:

38% give family reasons (such as death of a partner, moving closer to family); 33% say they have care, health or mobility needs; 24% want to reduce their running costs/maintenance bills because their property is too big; 19% want to release capital; and 10% are planning in advance of retirement.<sup>101</sup>

In terms of the preferred type, tenure and size of the home sought by those who wish to move, Claudia Wood said:

We have done additional polling which shows about a quarter are interested in retirement housing, so specialist housing specifically, whether that be the downsizer retirement type or the extra care type. There is obviously a spectrum [ ... ] The work we have done on this has shown that the majority want to buy their own home. They do not want to lease it; they want to buy it. Two-bedroom tends to be the most popular.<sup>102</sup>

### The barriers to moving

48. Although a sizeable minority of older people wish to move, the evidence suggested that a combination of practical, financial and emotional barriers prevented or, at least, delayed the process.<sup>103</sup> This certainly seemed to be the experience of many of the contributors to our web forum; one contributor said:

I have considered downsizing but not worth it! Cost of moving physically, legally, estate agent's commission, refurbishing new home, general hassle

97 Q5

98 Q5

99 Q6

100 [www.downsizingdirect.com](http://www.downsizingdirect.com)

101 United for All Ages [[HOP 016](#)]

102 Q5

103 Q8

and above all having to pay a huge amount of stamp duty on new home, having paid all my life—simply not worth it! Also cannot find property with light and space required—all new flats and retirement homes too small, overpriced with many “strings attached”.

Others had moved, and with a successful outcome. One contributor, who moved to a small terraced house nearer to her family, shops and transport, said the move had been “almost entirely positive for my health and wellbeing. I see family members most days, and also have the stimulus of getting to know a new neighbourhood”. **Many older people would like to move in later life but often the physical, financial and emotional aspects of moving home prevent or delay them from doing so, and we heard that many of those who do move often wished they had done so sooner, often “five to 10 years earlier”.**<sup>104</sup> *The national advice service should provide information and advice on moving, including the practical aspects of moving and where to obtain help with this; housing options; and finance, including mortgages, help to buy and shared ownership.* The rest of this chapter examines the barriers to moving and offers recommendations for policies which would help people who wish to move to do so.

### Practical support to move

49. For most people, regardless of age, moving home is an exhausting process, both physically and emotionally. Claudia Wood of Demos described what might be involved:

Getting into the loft and unpacking A-level textbooks from your kids that are still there is pretty daunting. Downsizing requires getting rid of some of your stuff. It requires putting it on eBay, giving it to charity shops and packing it. The practical issue is a major issue for old people.<sup>105</sup>

She said this was compounded by the fact that “People do not look for a retirement property when they are 60 and particularly capable of moving and quite happy to do so. They look at it when they are 75 or 80”.<sup>106</sup> Gail Lincoln, a psychologist conducting research on older people moving home, found that among the participants she interviewed, “for those who have less energy, poor health and who feel overwhelmed, decluttering and taking control seem to be very difficult”.<sup>107</sup> One contributor to the web forum said that the “stress of doing this would be insupportable even with help, let alone without it”.

50. John Galvin of the Elderly Accommodation Counsel told us that private companies exist which can provide this kind of help: “They enter the loft, pack, help people sort, give away things, sell things, keep what matters, and then are with them on removal day and deal with the utilities”.<sup>108</sup> We are also aware that some housing developers provide these services for people moving into one of their homes.<sup>109</sup> For example, McCarthy and Stone’s ‘Smooth Move’ service offers help packing, de-cluttering, transportation, unpacking and handymen to help with tasks in the new home, in addition to help with the costs of moving. We also heard about similar initiatives in the social sector, such as Grand Union

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104 Q8

105 Q8

106 Q8

107 Gail Lincoln [[HOP 034](#)]

108 Q166

109 For example, Churchill Retirement Living

Housing Group’s ‘incentive to move’ scheme which offers tenants practical support with moving.<sup>110</sup> Anchor, a provider of sheltered housing, said that housing associations are “well placed” to provide this kind of support.<sup>111</sup>

**51. Moving home requires a significant amount of physical resource particularly for older people who may have less energy, health needs and a lifetime’s worth of belongings to pack and unpack. We recommend that the national advice service should consider how best to gather information about local organisations which can provide practical help with the moving process (decluttering, disposing of unwanted items, packing and unpacking, removals and cleaning) and, where possible, signpost people to these organisations. Furthermore, trade and professional bodies involved in the home buying and selling process, such as The British Association of Removers, NAEA Propertymark, The Law Society and the Royal Institution of Chartered Surveyors, should consider creating an accreditation for their members which provide tailored services for older people. Once accredited, firms would be permitted to display the branding used by the national advice line and linked organisations.**

### **Financial barriers**

**52.** The financial costs of moving home are numerous; estate agent, surveyor and legal fees; stamp duty on the new home; packing and removals; and the costs of fixtures, fittings and furnishings for the new home, as well as sometimes redecoration and improvements. The estimated direct cost of a successful house move in the UK is £8,451.49,<sup>112</sup> and there is a real risk of additional costs if the transaction falls through and the process starts again. When surveyed in January 2018, 54% of Later Life Ambitions’ members said that the cost of moving was the main barrier to them doing so.<sup>113</sup> Shortly after our inquiry started, the Government launched a consultation on the home buying and selling process.<sup>114</sup> The then Housing Minister, Alok Sharma, explained to us that the Government intends to improve the process by making it faster and more certain. He said that this would particularly help older people who “may find it perhaps more stressful, particularly when you are moving from a property that has been your home, where you have brought up your family”.<sup>115</sup> **The Government’s commitment to improving the home buying and selling process is welcome and, given the Minister’s evidence, we expect to see particular consideration given to how the process can be improved for older people.**

**53.** Later Life Ambitions said that, in a survey of 1,500 of their members in January 2018, nearly 30% cited stamp duty as the biggest barrier to moving.<sup>116</sup> They, along with various other organisations,<sup>117</sup> called for a stamp duty exemption for older people moving to a smaller property. Professor Geoff Meen of the University of Reading highlighted the fact that, although not insignificant, stamp duty and other transaction costs would not

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110 Grand Union Housing Group [HOP 019]

111 Anchor [HOP 042]

112 Based on buying and selling the average UK property, at a price of £218,225 as of January 2017, [www.comparemymove.com](http://www.comparemymove.com)

113 Later Life Ambitions [HOP 036]

114 DCLG, [Improving the home buying and selling process: call for evidence](#), October 2017

115 Q263

116 Later Life Ambitions [HOP 036]

117 Later Life Ambitions [HOP 049]; McCarthy and Stone [HOP 059], United for All Ages [HOP 016], Churchill Retirement Living [HOP 025], Larkfleet [HOP 040]

generally negate the capital gain released from moving to a smaller home.<sup>118</sup> This was highlighted in the submission from HM Treasury, which stated that the average cash release on moving from a four to a two bedroom property is £215,000<sup>119</sup> and that, in 2016–17, an estimated 54% of residential property transactions paid less than £2,500 in stamp duty and 23% paid no stamp duty.<sup>120</sup> We note, however, that the average cash release figure of £215,000 will have been skewed by property prices in London and the South East and that, outside these regions, the cash released will be much less.

54. Professor Meen said he did not think that reforms to stamp duty would “fundamentally change the nature of the over 60s moving”.<sup>121</sup> Dr Peter Kenway, Director of the New Policy Institute, thought there was “sufficient argument for looking seriously at it” but made the wider point that:

Once you start to bring in special measures for some particular group or form of property, you just introduce the kinds of inefficiencies into the system that other committees here will then spend years trying to get rid of. By all means, we do need to do something about the disincentives, but I know of no reason to particularly target this group, who after all are a big chunk of the ordinary, mainstream housing market.<sup>122</sup>

Similar concerns were raised by the Building Societies Association, which said an exemption would be:

A difficult policy to implement politically. While not true of everyone, many older people have seen the equity in their home increase significantly in value over recent decades. To provide incentives for older people to realise those equity gains, while others struggle with raising a deposit or ‘second-stepping’, could be controversial.<sup>123</sup>

**55. We have carefully considered calls for a stamp duty exemption for older people but are not convinced that this would enable many more people to move. Many older home owners are likely to receive a capital gain when they move that will cover the cost of the stamp duty payable on their new home. In addition, we believe that an exemption would be extremely difficult to implement. We believe that stamp duty is not the main barrier to older people moving home and that there are many other practical, emotional and financial factors which act to deter people from doing so.**

### **Access to finance to buy a new home**

56. While some older owner occupiers will have sufficient equity in their home to be able to purchase a new property outright, others will need a mortgage to be able to do so; for example, if they wish to purchase a more expensive property, move to a more expensive area, or transition from renting to owning a property. Currently, only a small number of people take out a mortgage beyond retirement age but the numbers are increasing. UK Finance said:

118 Q142

119 Savills, [Making use of housing wealth](#), February 2013

120 HM Treasury [[HOP 033](#)]

121 Q143

122 Q144

123 Building Societies Association [[HOP 017](#)]

The annual value of mortgage sales to those aged 55 and over was £9.8 billion in 2016. The proportion of later life mortgage sales to those aged 70 and more has almost doubled, from 10% in 2012 to 18% in 2016; largely due to the increase in lifetime mortgage sales (which represented 29% of all mortgage sales to those 55 and above in 2016). Our figures also reveal that almost 40% of new mortgage sales in 2016 are due to end after age 65, compared to 22% in 2012.<sup>124</sup>

57. Mark Bogard, Chief Executive of the Family Building Society, said that some providers were reluctant to lend to older people:

If you are a large provider [ ... ] you have a machine, and you want to feed a large number of cases through that machine. Old people are much more complicated [ ... ] The only way to deal with a mortgage for older people is by looking at them and being told a story. If you are one of the big six lenders you cannot be bothered to do that, because for X% of the market it is not worth you doing it.<sup>125</sup>

In this regard, the fact that 70% to 80% of the mortgage market is intermediated<sup>126</sup> can be helpful to older people; Mark Bogard said:

The advantage of seeing an intermediary, a mortgage broker, is that they will tell you about the whole market. If you walk into the Nationwide and the Nationwide says no, you have to go through a whole process, which can take several hours and time to get an appointment.<sup>127</sup>

**58. A small but increasing number of older people take out a mortgage beyond retirement age. They may have more success obtaining advice from a mortgage broker, who can better assess their personal financial circumstances, than approaching a high-street lender directly. We recommend that the Government should encourage lenders to improve the service they provide to older customers. This should entail the provision by high street lenders of clearer guidance, on their website and in the literature available in the branch, on their policy with respect to lending to older people. We also recommend that, where an older person who applies for a mortgage or re-mortgage is rejected, the lender should routinely refer them to another lender, a mortgage broker or, once established, the single financial guidance body for advice (see paragraph 60).**

59. The Elders Council of Newcastle said that the level of housing equity held by older people in the North East was often insufficient to purchase a retirement home,<sup>128</sup> which we anticipate will also be the case in other parts of the country. We were therefore concerned to hear that lenders were often unwilling to lend on the purchase of specialist housing. The Building Societies Association said that this was because of the:

Potentially complicated leasehold conditions attached, with deferred service charges for care and support and communal areas, exit fees and transfer fees, which can affect the property's mortgageability [ ... ] the pool of

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124 UK Finance [\[HOP 030\]](#)

125 Q170

126 Q176

127 Q176

128 Elders Council of Newcastle [\[HOP 033\]](#)

prospective purchasers for such properties is limited by age. This can make them more difficult to sell, and the financial crisis showed a propensity for these properties to lose value quickly. As such, if older people require mortgage finance then it is advisable to opt for general needs housing to right size into.<sup>129</sup>

Similarly, Mark Bogard said that, for these reasons, it was “an extremely unattractive asset for the Society to end up owning if things go wrong”.<sup>130</sup> However, Paul Smee of UK Finance said that there would “always be lenders who would be prepared to look at this”.<sup>131</sup> ***The Government and UK Finance should together consider what steps can be taken to increase lenders’ confidence in lending on the purchase of specialist housing. The Government’s acceptance of the Law Commission’s recommendation for a code of practice on event fees and specific legislation for the extra care housing sector (discussed in paragraphs 99 to 101) may also help to sustain resale values, thereby boosting lenders’ confidence.***

### Financial advice

60. More widely, we heard that the set-up of the industry did not lend itself well to advising older people on their personal finances which can involve “complex, often inter-related decisions about a range of financial services products, from pensions, wealth management and mainstream mortgages, to equity release”.<sup>132</sup> Research by UK Finance found that older people have a “lengthy, fragmented and complex” journey to obtain the help they needed.<sup>133</sup> As discussed in paragraph 38, there is usually a separation of advice on mortgages and equity release when advice on both may be needed. In addition, Mark Bogard of the Family Building Society said there was a separation of advice on mortgages and investment, which was often needed by older people who “might downsize, still have a mortgage and end up with a pot of money”.<sup>134</sup> Paul Smee of UK Finance suggested that the creation of the single financial guidance body, legislated for by the Financial Guidance and Claims Bill (Lords)<sup>135</sup> currently before this House, will “give a single focus point for people entering the market”.<sup>136</sup> UK Finance suggested it “should explore ways of increasing the provision of and signposting to fuller information sources available to older consumers”.<sup>137</sup> ***We recommend that the single financial guidance body, for which the Financial Guidance and Claims Bill (Lords) will legislate, should be made responsible for providing specialist advice tailored to the financial circumstances of older people. It should signpost older people to mortgage brokers, banks and building societies who can offer advice on mortgages and equity release, shared ownership and shared equity, and on re-investing the proceeds of sales. The national advice service should be closely linked to the single financial guidance body and signpost people seeking housing finance advice to it.***

129 Building Societies Association [HOP 070]. See also Mark Bogard at Q173

130 Q173

131 Q174

132 UK Finance [HOP 030]

133 UK Finance [HOP 030]

134 Q163

135 Financial Guidance and Claims Bill [HL] 2017-19

136 Q165

137 UK Finance [HOP 030]



## Shared ownership and shared equity

61. Shared ownership schemes, for example Older People's Shared Ownership,<sup>138</sup> are used to help eligible older people buy a share in a property with the remaining share owned by a housing association. John Galvin of the Elderly Accommodation Counsel said that shared ownership:

Gives a way of enabling people to buy with a much smaller capital sum. Of course, it goes hand in hand with paying rent on the part you have not bought. The sums can still work quite well for some people.<sup>139</sup>

Kent Housing Group made the further point that shared ownership enabled people to move while “still retaining a level of investment to pass through inheritance, which is often a reason older people cite for not wishing to move”.<sup>140</sup> We heard, however, that the current proliferation of local models made it complicated for lenders to participate.<sup>141</sup> Paul Smee of UK Finance said “The more we can see a prevailing model develop rather than very specific local models, the easier that will be to see the market grow [ ... ] The simpler it becomes, the greater the potential for expansion”.<sup>142</sup>

62. At present, the most important shared equity scheme is Help to Buy where the Government provides up to 20% (40% in London) as an equity loan on a new build property, although there are other shared equity products available on the market. The Help to Buy scheme enables people to purchase a property with a small amount of equity, a lower than average mortgage and an ‘equity loan’, covering a percentage of the property’s value. Although there is no age limit to people who are eligible for the scheme, the perception of those submitting evidence was that it was for mainly for first-time buyers.<sup>143</sup> Churchill Retirement Living explained why shared equity would also be benefit older people:

This gap between purchase price and a maximum loan is a problem shared for older people looking to move from their existing property and the price they need to pay for a retirement apartment, so the extension of this scheme to include older purchasers would also benefit older people looking to move into retirement apartments.<sup>144</sup>

We asked the then Housing Minister, Alok Sharma, whether Help to Buy was accessible to older people. He said that it was “not particularly suited to specialist housing” but was open to anyone purchasing a mainstream new-build home.<sup>145</sup>

63. In the course of the discussion about shared ownership and shared equity schemes, Mr Sharma said that “of course, very many of the people we are talking about already are homeowners”. This is true, however, as we have discussed, older people with low levels of equity will not necessarily be able to afford to move and some will want to release equity on moving. **Owner-occupiers in low-value housing or in poor condition may**

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138 [www.ownyourhome.gov.uk/scheme/opso/](http://www.ownyourhome.gov.uk/scheme/opso/)

139 Q177

140 Kent Housing Group [HOP 080]

141 Q188

142 Qq188–189

143 See, for example, Churchill Retirement Living [HOP 025], British Property Federation [HOP 062], Building Societies Association [HOP 070]

144 Churchill Retirement Living [HOP 025]

145 Q267



not be able to move unless they can access social rented housing or shared ownership. Both shared ownership and Help to Buy could play a more important role in enabling older people to afford to purchase a mainstream home or release equity when they move. *We recommend the Government should ensure that providers and lenders make these home ownership options available and transparent for older people and address perceptions that Help to Buy is aimed at first time buyers. We also recommend that the Government should work with lenders and housing providers to ensure one model for shared ownership which would encourage more lenders to offer mortgages, thereby widening access to this initiative, and consider how shared equity can be used for specialist housing.*

### A shortage of homes

64. Quite simply, older people who would like to move will be deterred from doing so if they cannot find a property that they would like to live in. This is particularly so given the practical, financial and emotional implications of moving. Julia Park of Levitt Bernstein said:

No one will be tempted to move to a home that's worse as well as smaller, so good design is vital if we want people to be proactive about finding a more suitable home; particularly as we spend more time at home as we get older.<sup>146</sup>

However, we heard that there was a lack of desirable and attractive properties,<sup>147</sup> and contributors to the web forum shared this opinion; one said “the design of most of the houses and bungalows that I viewed was very poor, tiny kitchens, tiny dining areas” and another said that, in the smaller mainstream properties she had visited, “the kitchens and second bedrooms are far too small [ ... ] couldn't consider moving into a property that doesn't have one large enough to accommodate family and friends when they visit”.

65. We heard evidence of a shortage of smaller properties and specialist housing. Later Life Ambitions said that, in a survey of 1,500 of their members, 55% highlighted a lack of smaller homes on the market as being barrier to moving.<sup>148</sup> The current shortfall in specialist homes is estimated at around 15,000 to 25,000 units a year.<sup>149</sup> Keepmoat, a homebuilder and construction company, identified the further challenge of “inadequate dispersal of homes for older people, meaning that it can be difficult to find a new home close to friends and family”.<sup>150</sup> In the next chapter, we consider how to increase the supply of specialist homes and ensure good design.

### Moving in the social rented sector

66. While around three quarters of older person households are owner-occupiers, a significant minority live in the social-rented sector (16.5%).<sup>151</sup> In their 2012 report, the JRF said that “owner-occupiers may have more chance of moving than social or private tenants. There are fewer opportunities for tenants in social housing to move”.<sup>152</sup> We discussed the

146 Levitt Bernstein [HOP 032]

147 Q8. See also Royal Institute of British Architects [HOP 066]

148 Later Life Ambitions [HOP 036]

149 Q83

150 Keepmoat Group [HOP 068]

151 DCLG, [English Housing Survey 2015 to 2016](#), March 2017

152 JRF, [Market Assessment of Housing Options for Older People](#), April 2012

options for owner-occupiers with low value housing in paragraphs 61 to 63. Generally, the options for older social tenants include moving into sheltered housing or moving through an exchange, for example through the Seaside and Country Homes scheme, although housing associations are increasingly providing extra care housing. However, we heard that these options were themselves limited. Age UK said that there was a “pressing need” for more retirement housing in the social sector.<sup>153</sup> Midland Heart, a housing association, said:

Midland Heart operates its own waiting list for affordable housing through a platform known as ‘Homes Direct.’ We share this platform with a number of other large housing providers across the Midlands and so it can be used as a reliable indicator of unmet need for affordable housing for older people. There are currently 3,897 older people (55+) on the waiting list which represents 11% of the total number of applicants. Of these; 1,324 have multiple health conditions which represents 4% of the total number of applicants.<sup>154</sup>

Indeed, contributors to our forum often called for more sheltered and affordable housing; one person said “The Government needs to ensure that enough social housing is built to enable people like us to move into sheltered accommodation”. Despite this clear demand, we heard that many providers had placed their new developments on hold following the Government’s proposals for a new funding model for supported housing (which we consider in more detail at paragraphs 102 to 104).<sup>155</sup>

67. We also heard that sheltered housing is often not an attractive housing option. Claudia Wood of Demos said that “a lot of that sheltered housing needs to be either knocked down and rebuilt or, or quite considerably retrofitted to improve standards”,<sup>156</sup> and the housing providers and councils submitting evidence frequently acknowledged this. Grand Union Housing Group said:

The vast majority of older people’s housing owned by the Group is the traditional post-war Local Authority stock [ ... ] it is generally of limited adaptability small, in rural locations and usually difficult or impossible to adapt to address customer deteriorating health conditions. As such, it may not be a particularly attractive option for people considering downsizing, either from within our own stock or from elsewhere, and, this stock can become difficult to let.<sup>157</sup>

However, our visit to Priory Court, an extra care scheme recently built by Central Bedfordshire Council, proved that this was not universally the case, and we have seen other examples of good quality sheltered housing in our constituencies.

68. In addition, the process of finding and securing a new home for social tenants could be difficult. One contributor to our forum said:

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153 Age UK [[HOP 085](#)]

154 Midland Heart [[HOP 026](#)]

155 For example, Riverside Group Ltd [[HOP 048](#)], Housing LIN [[HOP 012](#)]

156 Q21

157 Grand Union Housing Group [[HOP 019](#)]. See also Basildon Borough Council [[HOP 022](#)], Southwark Council [[HOP 056](#)]

It was quite a traumatic experience, not helped by being 71 and on my own. I was only given 5 days to say yes or no to the property I had bid on, I had to pay rent straightaway although I did not move in until a month after, as I had to give a month's notice to [ ... ] my landlord.

Furthermore, contributors who had undertaken an exchange often commented on the poor state of their new home; one said that “the policy is that if you exchange you accept the new home ‘as is’”. We note, however, as discussed in paragraph 50, that some housing providers offer their tenants practical help with moving. Grand Union Group explained that they did this to encourage older people to move, thus freeing up larger stock which was in demand from families.<sup>158</sup>

**69. We believe that the options for older social tenants who wish to move are limited. There are wider social advantages in enabling this group to move if they wish to do so, namely the health and wellbeing benefits that can result from more appropriate accommodation and the fact that it can free up homes for families waiting to move. More of all types of housing for older people—extra care, sheltered and accessible housing—need to be built across the social and private sectors.** We make further, specific recommendations on this in paragraph 122.

## What is the impact of ‘downsizing’ or ‘rightsizing’ on the wider housing market?

70. The terms of reference for this inquiry asked whether more housing designed specifically for older people could help address England’s wider housing needs. We asked for evidence on this in light of the report by Legal and General which suggested that older owner occupiers could release up to 2.6 million family homes by ‘downsizing’<sup>159</sup> and a report by Demos which suggested that it could release 3.29 million properties.<sup>160</sup> This was a controversial topic. The term ‘downsizing’ was problematic, with some preferring the term ‘rightsizing’<sup>161</sup> and others stating there is no ‘right size’ when people’s housing needs are diverse.<sup>162</sup> More significantly, while many submissions proposed that ‘downsizing’ or ‘rightsizing’ could play in tackling housing shortages,<sup>163</sup> others had strong objections to this. The National Pensioners Convention said that:

These problems however are not the fault of one generation, and suggestions in public debate that older people have deliberately thwarted the home-owning aspirations of their grandchildren are both dangerous and inaccurate.<sup>164</sup>

The Centre for Ageing Better said that the subject was “poorly understood” and that:

Very little analysis has been done at the regional level, meaning we do not know if releasing under-occupied homes by encouraging older people to move out would necessarily match local demand. We do not yet have a

158 Grand Union Housing Group [HOP 019]

159 Legal & General, [Last Time Buyers](#), 2015

160 Demos, [Top of the Ladder](#), September 2013

161 Elders Council of Newcastle [HOP 033]. See also John Godfrey at Q127

162 Care and Repair [HOP 013]

163 See for example, The Intergenerational Foundation [HOP 074]

164 National Pensioners Convention [HOP 008]

sophisticated picture of where older people move to when they move out, nor do we know who then moves into their old homes. It is not clear that these homes necessarily go to new owners or tenants who are less likely to under-occupy.<sup>165</sup>

71. Given the divergence in opinion, we explored the issue in more detail with witnesses. We asked first about under-occupation among older households, which presupposes that older people moving home would free up larger homes. Dr Peter Kenway of the New Policy Institute urged caution about “assuming that under-occupation, measured like this is a problem” and pointed out that a high proportion of all owner occupiers under-occupy.<sup>166</sup> Professor Meen of the University of Reading said that the over-60s had higher levels of consumption of housing than the population as a whole: “well over 60%” for older households compared to 50%.<sup>167</sup> We appreciate, however, that people may need this space for visiting family and friends, carers, work or hobbies.

72. With regards to the impact on housing supply, Professor Meen said that any impact would happen over a long period of time and that, on the basis that 50,000 to 100,000 are required each year, “the effects of releasing homes via people downsizing [ ... ] are going to be fairly modest”.<sup>168</sup> However, John Godfrey of Legal and General thought that “over time this could potentially be a pretty big shift”.<sup>169</sup> We asked our witnesses what might incentivise more older people to move home to make a difference. Professor Meen said that, given older people generally had low housing costs (only fuel and council tax after a mortgage had been paid off), were attached to their home and faced transaction costs on moving:

If you are going to introduce incentives to try to persuade people to move, they have to be strong incentives. They are not playing around at the edges and not really going to have an effect. I think we would all agree that reforms to stamp duty are useful, but by themselves they will not be enough. The question is about—and this is going to be unpopular—what you actually have to do to be effective. You have to raise the price of housing for that particular group, when it is very, very low at the moment. That comes back to questions such as council tax, land value tax, and those sorts of things, but that is really what you are talking about if you fundamentally want to induce a big increase in the number of that group actually moving.<sup>170</sup>

We also heard that older people may be reluctant to give up their “prime asset” which they may wish to pass on to their family or use to release equity from<sup>171</sup> or use to pay for specialist care and nursing home fees.<sup>172</sup> Furthermore, we heard that the capital gain to be made from moving to a smaller home, once the transaction costs had been accounted for varied greatly depending on the type of property and its location. Professor Meen said:

In 2016, if you were talking about the south-east, the average detached property price—and I take the point about averages being a problem—was

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165 Centre for Ageing Better [[HOP 046](#)]

166 Q125

167 Q125

168 Q140

169 Q140

170 Q142

171 Q129

172 The Salvation Army [[HOP 004](#)]

£597,000. The average price of a bungalow was £383,000, so the gain for them would be £214,000. Admittedly, if you did the same calculation in the north-east, it would only be £77,000, but the distribution across property types is similar across the region, so that is the sort of number that we are talking about.<sup>173</sup>

73. We asked the Minister if his Department had looked at the impact of ‘right sizing’ on the wider housing market. He responded by saying that it was a question of choice for people and he would not want an older person to “feel that there was almost a pressure or a requirement to move out of the family home they have been in for many years”.<sup>174</sup> We agree. **We heard frequent claims that older people moving home in later life could be part of the solution to tackling the housing shortage but little real evidence to support this. We believe that this issue warrants further investigation as there may be wider social advantages in older people moving to a smaller home that better suits their needs. *The Government should commission independent research to investigate the impact of ‘rightsizing’ on the housing market. This research should aim to provide a better understanding of how many older people move, where they move to, who moves into the homes they vacate and to what extent this helps to satisfy local demand for homes.***

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173 Q145

174 Q285

## 6 Housing options

74. As emphasised at the outset of this report, older people are a highly diverse group and this is also the case for their housing preferences. Older people may choose to live in mainstream housing, accessible housing, specialist housing, including retirement and extra care housing, and cohousing. How and where they choose to live will depend very much on personal preference, age, income, equity and health, mobility and care requirements. As John Godfrey of Legal and General said, “it is horses for courses somewhat in this area”.<sup>175</sup> In this chapter, we examine the key themes of the evidence in relation to different types of housing.

### Accessible homes

75. The standards relevant to accessible housing are set out in Approved Document M (Access to and use of buildings) Volume 1: Dwellings.<sup>176</sup> Published in 2015 following the Housing Standards Review,<sup>177</sup> this document streamlined and replaced various different sets of standards, including for accessible housing. There are three standards: Category 1—visitable dwellings; Category 2—accessible and adaptable dwellings; and Category 3—wheelchair user dwellings. Categories 2 and 3 broadly reflect respectively the Lifetime Homes standard and the Wheelchair Housing Design Guide, developed by Habinteg, and building to these standards make homes more accessible and adaptable.

76. All new homes must be built to Category 1. This standard is met when a new dwelling has level access, a flush threshold, sufficiently wide doorways and circulation space, and a WC at entrance level. Habinteg said that this standard was “not sufficiently accessible for most older and disabled people and it is only ‘visitable’ in the loosest sense”.<sup>178</sup> In 2014, only 7% of all homes (existing as well as new stock) in England had been built to Category 1,<sup>179</sup> however, the overall proportion of new homes being built to this standard has increased from 13% before 2001 to 68% since 2001.

77. The higher Category 2 and 3 standards are optional. Julia Park, Head of Housing Policy at Levitt Bernstein, explained how a Category 2 home could benefit an older person:

The principal benefits would be practical. They would have room to turn a wheelchair in a hall and be able to enter rooms without having to jiggle and make lots of movements. They would have a workable bathroom—quite a sizeable bathroom. They would be guaranteed step-free access to the front door. They would have a large WC at entrance level with the potential for a shower. So it is nothing particularly astonishing to look at, but all those little moves added together mean that day-to-day life would be very much easier.<sup>180</sup>

175 Q149

176 DCLG, [Approved Document M: Access to and use of buildings: Volume 1: Dwellings](#), March 2015

177 MHCLG, [Housing Standards Review: Technical Consultation](#), September 2014

178 Habinteg [[HOP 029](#)]

179 DCLG, [English Housing Survey 2014 to 2015: Adaptations and Accessibility Report](#), July 2016

180 Q76



We were able to see this for ourselves during our visit to Goodrich Court in Hounslow, a recently built development of Lifetime Homes and wheelchair accessible flats. We looked around a wheelchair accessible flat and a flat built to Lifetime Homes standards and could clearly see how the layout could accommodate a person's accessibility needs.

78. In addition, homes built to Category 2 and 3 standards are intended to be 'futureproof', easily able to accommodate subsequent adaptations with "strengthened walls in key areas such as WCs and bathrooms where grab-rails are most likely to be needed and a stair that is capable of accepting a stair- lift".<sup>181</sup> In contrast, we heard that some adaptations to mainstream homes, like widening doors, putting in ramps and lifts, were very difficult to do retrospectively<sup>182</sup> and not always aesthetically pleasing.<sup>183</sup> Julia Park said this provided "real pointers for where we should be heading in the future".<sup>184</sup>

79. The then DCLG said that, in applying the optional Category 2 and 3 standards, local planning authorities need to take:

A proportionate and evidenced based approach to ensure that housing supply is not held back by unnecessary red tape. [They] will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans. This would be based on their housing needs assessment and other available datasets considered appropriate by the local planning authority.<sup>185</sup>

Local Plans are expected to set out the proportion of new dwellings in the area that are required to meet the standards, which are then applied to individual developments through planning conditions. However, a freedom of information request by Habinteg to councils in 2016 revealed that, of the 82% of local authorities which responded, only 8% had planning policies in place to build to Category 2 standards and tracked the number of homes being built accordingly.<sup>186</sup> Once London Boroughs were excluded—the London Plan requires all new homes to be built to Category 2 and 10% to Category 3—the proportion fell to 3%. Julia Park of Levitt Bernstein said:

There is literally that variation, from nothing to all, across the country, and that bears absolutely no relation to geographical or demographic need across the country. It is very much what the local authorities have had time to do, in terms of updating their local plans, or how brave they feel about, you know, upsetting developers and making it policy. That spread speaks for itself. It really isn't a policy that is working nationally; it is a policy that is working in a few places, and not at all in others.<sup>187</sup>

The then Housing Minister told us that "Authorities will need to consider affordability, viability and how all this will be maintained if they choose to adopt particular sets of standards. It is right to give [them] a level of autonomy in these matters".<sup>188</sup> In subsequent correspondence he told us that, because the Department did not collect data on specific

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181 Levitt Bernstein [[HOP 032](#)]

182 Q70

183 Q207

184 Q70

185 DCLG [[HOP 025](#)]

186 Q79

187 Q78

188 Q284

planning conditions set, they do not hold data on the number of homes built to the optional standards.<sup>189</sup> Research from Habinteg and the Papworth Trust found that there were 300,000 disabled adults with an unmet accessible housing need.<sup>190</sup> Later Life Ambitions' survey of their members found that, of the 1054 who said they had mobility issues, 75% reported that their home did not have specific features to support their accessibility needs.<sup>191</sup>

80. We asked witnesses how much extra it cost to build a Category 2 home. Andrew Gibson, Vice Chair of Habinteg, told us that building costs and space requirements meant an accessible three-bedroom semi-detached house cost, on average, £1,400 more to build than a less accessible house.<sup>192</sup> Supplementary written evidence from Levitt Bernstein included the table below. These figures were produced by external cost consultants for the then DCLG during the Housing Standards Review.<sup>193</sup> The top figure is the estimated building cost of providing the accessibility requirements and the bottom bracketed figure is the estimated part of the additional cost which cannot be recouped through higher sales values.

**Table 1: Cost per dwelling over and above current industry practice (£)**

	1b flat	2b flat	2b terrace house	3b semi-detached	4b detached
Category 1	—	—	—	—	—
Category 2	940 (289)	907 (289)	523 (578)	521 (866)	520 (866)
Category 3 (adaptable)	7,607 (2,310)	7,891 (4,043)	9,754 (6,065)	10,307 (6,931)	10,568 (6,931)
Category 3 (accessible)	7,764 (2,310)	8,048 (4,043)	22,238 (6,065)	22,791 (6,931)	23,052 (6,931)

Source: EC Harris, Cost impact report published during the Housing Standards Review, 2014

Andrew Gibson of Habinteg highlighted that the costs were not significant given “all the future proofing benefits we have talked about”.<sup>194</sup> However, we heard from Levitt Bernstein that the extra costs could lead developers to claim that they upset viability, leaving the standards “vulnerable to negotiation”.<sup>195</sup>

81. On building homes to Category 2 and 3, Claudia Wood of Demos said “it is one of the puzzles: why is everyone not doing it? It is basic common sense for long-term liveability of homes”.<sup>196</sup> We agree. We note that the House White Paper states that the forthcoming Neighbourhood Planning Act guidance will “set a clear expectation that all planning authorities should set policies using the Optional Building Regulations”.<sup>197</sup> **However, we believe that mandatory Category 1 standard is too low and that all new homes should be built to be ‘age proof’ for the current and future needs of an ageing population. We**

189 [Letter from the Minister of State to the Chair on housing for older people](#), 20 December 2017

190 Habinteg [HOP 029]

191 Later Life Ambitions [HOP 036]

192 Q77

193 MHCLG, [Housing Standards Review: Technical Consultation](#), September 2014

194 Q77

195 Levitt Bernstein [HOP 032]

196 Q42

197 MHCLG, [Fixing our broken housing market](#), February 2017



*recommend therefore that the baseline standard for all new homes should be Category 2. The Government should work with local authorities to collect data on the number of homes built to Category 2 and 3 standards and require that homes built to such standards are advertised as such in sales and lettings literature so they are easily identifiable.*

### **Making best use of accessible and adapted homes**

82. We heard there was a need to keep better track of the stock of accessible homes. Levitt Bernstein said:

Every [local planning authority] should, in theory, produce an accessible Housing Register and keep it up to date. In practice, this rarely happens which means that [local planning authorities] are unable to direct people towards housing that meets their needs.<sup>198</sup>

They went on to say that this was particularly important in relation to wheelchair adaptable housing, the potential of which may not be obvious on inspection. Jacquel Runnalls of the Royal College of Occupational Therapists also said that adapted homes could also be better identified and tracked by housing occupational therapists and surveyors to ensure that they were matched to people who needed them.<sup>199</sup> *We recommend that local authorities ensure their accessible housing register or comparable system is comprehensive and up-to-date and keep track of stock which has undergone significant adaptation so that it can be matched in the future to the needs of new occupants. They should also ensure that housing occupational therapists, surveyors and housing associations feed into the information gathering process.*

### **Specialist housing**

83. Specialist housing is a ‘catch all’ term for a range of types of housing for older people, other than care homes, which provide varying levels of support while enabling a person to live independently in their own living space. A range of terms are used to describe the different types of specialist housing. The Home Builders Federation said it comprised:

- Downsizer (age restricted) housing, for those aged 55 or above, with limited on-site staffing typically for the maintenance of the development and grounds;
- Retirement living (or ‘sheltered housing’), for those aged 60 and above, with on-site support provided by a warden or house manager and some communal facilities, such as a lounge;
- Extra care housing, with a large range of on-site services, including care that can respond flexibly to increasing need, and communal facilities; and
- Care villages / continuing care retirement communities, similar to extra care but with higher levels of care.<sup>200</sup>

Reference was also made to ‘assisted living’, ‘close care housing’, ‘housing with care’ and ‘retirement villages’. In addition, the terms ‘sheltered housing’ and ‘very sheltered housing’

198 Levitt Bernstein [[HOP 032](#)]

199 Q209

200 Home Builders Federation [[HOP 058](#)]

were used primarily for schemes in the social sector, although we note that these schemes are increasingly referred to as ‘independent living’.<sup>201</sup> Unsurprisingly, the terminology was described as “confusing”<sup>202</sup> and Barton Willmore, a planning and design consultancy, said “There is no ‘standard definition’ for any of these; in many cases, they overlap and people do not know where to begin; or where to seek advice”.<sup>203</sup> Dr Brian Beach of the International Longevity Centre-UK explained that specialist housing in other countries, particularly America and New Zealand, was very popular. He said that

[In the UK] For the consumer, it is less clear what product is on offer [ ... ] The success in other markets in other countries is attributed by many experts to the consistent concept that people have and their ideas. As one person put it, there needs to be a unification of a concept that appeals to different needs but does not develop into an incredibly complex network or array of options.<sup>204</sup>

**84. The current array of terms used to describe the different types of specialist housing is confusing, although what is provided is diverse. This makes it difficult for people to understand what is on offer and make comparisons, and may ultimately be off-putting for people interested in this type of housing. We note that the success of specialist housing in other countries may be due to having a “consistent concept” of what is on offer. The Government should instigate discussions between developers and providers of specialist housing with the aim of agreeing on a consistent terminology to describe the housing and related services on offer.**

### **A shortage of homes**

85. Currently, only around 5% of the over-65 population live in all types of specialist housing,<sup>205</sup> yet the evidence suggested that many more older people would like to do so. Claudia Wood of Demos said that a quarter of older people polled by her organisation were interested in moving to specialist housing.<sup>206</sup> Michael Voges, Executive Director of the Associated Retirement Community Operators (ARCO), the representative body for providers of extra care housing, said that there was a “huge demand” for this type of housing, describing people “queueing down the corridor” waiting for a new scheme showroom to open.<sup>207</sup> Paul Teverson, Director of Communications at McCarthy and Stone, agreed, saying “across our managed stock, only about 4% is vacant [ ... ] so we know that there are generally waiting lists for people to buy one of our properties”.<sup>208</sup> Midland Heart, a housing association, said that there was sufficient demand to “support the development of thousands of new units of older person specific housing in the Midlands over the next ten years”.<sup>209</sup> The current shortfall is estimated at around 15,000 to 25,000 units a

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201 Q201

202 Levitt Bernstein [[HOP 014](#)]

203 Barton Willmore LLP [[HOP 064](#)]

204 Q8

205 Associated Retirement Community Operators [[HOP 060](#)]

206 Q5

207 Q83

208 84

209 Midland Heart [[HOP 026](#)]

year.<sup>210</sup> Taking into account future housing need, the Housing LIN estimates a shortfall of 400,000 units of specialist housing by 2035.<sup>211</sup> Jeremy Porteus said this comprised the following units:

About 70,000 is extra care housing. About half a million is sheltered housing, but increasingly it is also a move towards this rightsizer/downsizer accommodation, which is still fairly immature, but is seen as an attractive choice. Of that, we are probably talking between about 80,000 to 90,000 properties that have been reclassified as that.<sup>212</sup>

86. In addition, we heard that there was a particular shortage of privately developed specialist homes and, as a result, a shortage of homes for private sale<sup>213</sup> and “virtually none” for private rent.<sup>214</sup> Audley Retirement, a private provider, said that the concentration of specialist housing in the housing association and charitable sector had “caused an imbalance in many areas where as much as 80% of the population are owner occupiers”.<sup>215</sup> Furthermore, with regards to extra care housing, the ‘middle market’ was particularly poorly catered for. ARCO said:

The majority of older people’s housing-with-care provision caters for those eligible for social/affordable rent (housing benefit) [ ... ] The majority of the older and ageing population fall into the ‘middle market’ bracket: those owning average sized two or three bedroom houses who would be ineligible for social rented accommodation, and unable to afford accessing high end provision. This group is therefore particularly under-served. Indeed, there is currently only enough middle market stock to cater for around 0.1% of older people in this income bracket.<sup>216</sup>

**We believe that, in the face of demand, there is a shortfall in supply of specialist homes in general and particularly for private ownership and rent and for the ‘middle market’. This limits the housing options available to older people and the opportunity to derive the health and wellbeing benefits linked to specialist homes.** In the following chapter, we discuss the evidence we received about the impact of the planning system on number of specialist homes being built.

### *Health and wellbeing benefits*

87. There is a significant body of evidence on the health and wellbeing benefits to older people of living in specialist housing and the resultant savings to the NHS and social care.<sup>217</sup> This is particularly the case for extra care housing, which has onsite care and support and communal facilities. In addition, this type of housing helps family and carers finding it challenging to provide enough care and support.<sup>218</sup> We visited two extra care

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210 Q83

211 Housing Learning and Improvement Network [[HOP 012](#)]

212 Q7

213 Q83

214 Q85

215 Audley Retirement [[HOP 018](#)]

216 Associated Retirement Community Operators [[HOP 060](#)]

217 Q50

218 Levitt Bernstein [[HOP 014](#)]

housing schemes; Battersea Place, a luxury development in Battersea, and Priory View, a scheme built by Central Bedfordshire Council. We were impressed with the facilities and lively atmosphere at both.

88. Research by the International Longevity Centre-UK found that around a quarter of people who moved into extra care housing with social care needs (or went on to develop them) experienced an improvement within five years, were less likely to be admitted to hospital overnight and had fewer falls.<sup>219</sup> Subsequent research found that, in comparison to older people in the general community, extra care residents reported having a higher quality of life, a higher sense of control and lower levels of loneliness.<sup>220</sup> While at Aston University, Professor Holland led a three-year study on the impact on older people's health of living in the ExtraCare Charitable Trust's extra care schemes. She told us about some of the findings:

We looked at how long people spent in hospital in the year before they moved in, with a follow-up the year after they moved in. We found a significant reduction from a median of five to seven days to a median of about one to two days for unplanned hospital visits [ ... ] There are several possible reasons for this. ExtraCare has a wellbeing adviser, so a nurse, and a drop-in advice clinic where people can get advice on health issues [ ... ] Another reason is that people's homes in supported living are purpose built, so there are no access issues. They have a wet room shower. There are no steps or stairs. They are all very accessible. The other thing is that there is care on site. [ ... ] Finally, the support is available to enable self-care from that wellbeing adviser, who is a nurse, so to help them learn how to look after any new tablets.<sup>221</sup>

Professor Holland's study found that the NHS costs for those in the sample were reduced by 38% and that the costs for frail residents had reduced by 51%.<sup>222</sup> In addition, local authority costs of providing lower and higher level social care were 17.8% (£1,222) and 26% (£4,556) lower respectively on average per person per year. With regards to retirement housing, research from the University of Reading showed that it can help combat social isolation and promote fitness, with over 80% of owner occupiers of retirement housing taking part reporting feeling happier in their new home and nearly a third feeling that their health had improved.<sup>223</sup>

89. Providers of sheltered housing emphasised their role in helping older people to stay healthy, reducing hospital admissions and delayed transfers of care, thereby generating savings to health and social care budgets.<sup>224</sup> Research by Demos estimated the value of sheltered housing to the NHS and social care at £486 million per year, of which £17.8 million amounted to reduced loneliness.<sup>225</sup> In light of this, the Government's support for specialist housing under the Shared Ownership and Affordable Housing Programme and the Care and Support Specialised Housing Programme is welcome.<sup>226</sup>

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219 International Longevity Centre-UK [[HOP 079](#)]

220 Q49

221 Q196

222 Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust, [Final report](#), April 2015

223 British Property Federation [[HOP 062](#)]

224 Riverside Housing Group [[HOP 048](#)], Nottingham City Homes [[HOP 067](#)]

225 Q50

226 DCLG [[HOP 025](#)]

90. Age UK highlighted that such benefits depend on the quality of the scheme and said that there were clear differences between “housing at the top-end of the market” and “run-down badly managed sheltered housing with little or no housing support”.<sup>227</sup> Indeed, some of the contributors to our web forum were unhappy about the level of support provided to them by their housing association, describing “neglect” and “lack of emotional support”, homes not being adapted to meet their needs and not being redecorated and repaired between occupants. In contrast, another contributor said that her housing association had a “strong ethic of care for its tenants and leaseholders”. Sue Adams of Care and Repair said that analysis of LOGASnet data had shown a “really big shift away from social landlords doing the repairs in their homes” and also said that her organisation had heard evidence of some social landlords refusing permission for adaptations.<sup>228</sup>

**91. Specialist housing, and particularly extra care housing, can promote the health and wellbeing of older people and their carers, leading to savings in spending on health and social care. *We recommend that the planned social care green paper should include plans to promote awareness of this type of housing so it becomes an option for older people whose care needs are not significant enough for residential care.***

**92. Registered social landlords also play a significant role in promoting the health and wellbeing of vulnerable older tenants. We believe that, as recommended by our predecessor Committee,<sup>229</sup> housing associations should remain mindful of their social mission to ensure that they make best use of this position and consistent levels of service, the Government should publish standards setting out their role and responsibilities to their older tenants, including ensuring good quality, adapted (where necessary) housing and, more widely, falls and accident prevention, preventing hospital admissions and enabling prompt discharge.**

### ***Paying for specialist housing***

93. There are concerns about the cost of and costs associated with specialist housing and its resale value. Most specialist housing is leasehold. Leaseholders are also required to pay regular service charges for the upkeep of the facilities and for the shared services. They may also be required to pay ground rent. In addition, ‘event fees’, which are payable by the leaseholder typically on the sale of the property, are common.

94. Specialist housing costs more to buy than its non-specialist equivalent. Paul Teverson of McCarthy and Stone said that their apartments were “about 10% more expensive than an average apartment in the local area”.<sup>230</sup> However, from experience in our constituencies, we believe that the cost is somewhat higher. Contributors to our web forum remarked on this; for example, one person said the private retirement villages in her area were “for the very rich” and the equity in her current property would not be sufficient to buy an apartment in one. We note, however, that developments range from the expensive high-end to the more affordable.<sup>231</sup> Paul Teverson said that there was a “premium” because “You are buying into not just the 800 square feet of the apartment but the homeowners’

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227 Age UK [\[HOP 085\]](#)

228 Q72

229 Communities and Local Government Committee [Housing associations and the Right to Buy: Second Report of Session 2015–16](#), February 2016

230 Q97

231 Q103

lounge, the restaurants and the services”.<sup>232</sup> He went on to say that, as a consequence of the communal areas which are a feature of specialist housing, the Community Infrastructure Levy (CIL) was higher. We consider the application of CIL to specialist housing in more detail in chapter seven.

95. The Elders Council of Newcastle said the resale market for specialist housing was “difficult” and “losing money is a common feature”<sup>233</sup> and we note the research undertaken by the Elderly Accommodation Counsel for the BBC which found that around half of new build retirement homes sold during a 10-year period were later re-sold at an average reduction in value of 17%.<sup>234</sup> However, ARCO said that research they had conducted found that the vast majority of extra care housing properties increased in value on resale.<sup>235</sup> Paul Teverson of McCarthy and Stone said that the instances of their retirement homes losing value “related to 2006–07 developments [ ... ] that were sold on the eve of the house price crash” and said that they now have:

A really positive story to tell on resales. When we look at resales in the four or five years over that period, on average they were first sold at £196,000 and they have resold at £198,000. That is maybe not tracking house price inflation across the UK, but on average they are holding or slightly retaining their value.<sup>236</sup>

96. Service charges on specialist homes typically include a contribution towards the cleaning and maintenance of the communal areas and grounds, the servicing and maintaining of lifts, as well as charges for support services, such as staffing costs, care support and catering. Charges can vary widely depending on the type of specialist housing, who manages it and the services that are provided. Which? states that service charges “could be anything from £100 to £300, or even in excess of £500 per month for a luxury property”.<sup>237</sup> The service charges for McCarthy and Stone developments are available on their website. For 2017–18, the service charge is £55.37 per week for a two bedroom apartment in a typical Retirement Living apartment and £161.49 per week for a two bedroom apartment in a typical Retirement Living PLUS apartment. In the latter case, it states that “costs in these developments are higher to reflect increased staffing costs, the provision of domestic support packages, and the table service restaurant provided on site”.<sup>238</sup>

97. We were told by Age UK that high service charges may deter older people on low or fixed incomes from purchasing specialist housing<sup>239</sup> and also heard that, having already paid off a mortgage, they feel that it is like taking on another.<sup>240</sup> However, Claudia Wood of Demos said that people often did not realise that the service charge may cost less than servicing a property, suggesting it may be possible to save “£1,000 to £3,000 a year”.<sup>241</sup> She went on to say that awareness needed to be raised on what service charges were for and whether they were good value for money. Dr Beach of the International Longevity Centre-

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232 Q97

233 Elders Council of Newcastle [HOP 033]

234 BBC News, [Half of new-build retirement homes sell at a loss](#), 9 September 2017

235 Associated Retirement Community Operators [HOP 012]

236 Q108

237 [www.which.co.uk](http://www.which.co.uk) [accessed on 19 January 2018]

238 [www.mccarthyandstone.co.uk/faq/](http://www.mccarthyandstone.co.uk/faq/) [accessed on 19 January 2018]

239 Age UK [HOP 085]

240 Q29

241 Q29



UK said consumers needed “greater clarity” on what the product offers.<sup>242</sup> We also refer to the earlier cited evidence from John Galvin of the Elderly Accommodation Counsel that older people often needed advice on pricing arrangements, service charges and services and that it was a “big job to work out “What can I afford? What model would work best for me?”<sup>243</sup>

98. Following an Office of Fair Trading investigation, the Law Commission was asked by the then DCLG in 2014 to investigate the potentially unfair use of event fees in specialist housing. There had been cases of fees being charged in what the Law Commission referred to as “unexpected cases”, such as when a spouse, civil partner or carer moves in, or when an existing resident moves out. The Law Commission did not recommend abolishing event fees on the basis that they can make specialist retirement housing more affordable and may facilitate overall supply.<sup>244</sup> ARCO said:

Many older people are cash-rich and income poor. Payment and charging models using deferred fees (or ‘event fees’) are one way of enabling older people to use their housing equity to defer some of the cost of purchasing or occupying the unit until a later date.<sup>245</sup>

Michael Voges of ARCO explained how event fees incentivised operators to enter the market:

We have one member—a not-for-profit organisation—building something with £8 million or £9 million of communal facilities. That will be paid for not by the initial development but from the capital repayments over time, taken via the event fees, which will also pay for the interest. When you run these schemes over time, with the event fees you can reduce the amount of service charge that people might want to pay, and you can de-risk the service charge.<sup>246</sup>

99. The Law Commission found that “event fees and their financial consequences are not always clear to consumers when they are deciding whether to purchase a retirement property”.<sup>247</sup> They recommended better regulation and proposed a code of practice which, among other things, limits the circumstances in which event fees may be charged and obliges scheme operators to provide transparent information on event fees, including the level of fee, at an early stage in the purchase process. We note that members of ARCO already have a Consumer Code which ensures people are provided with clear and transparent information about fees, service charges and service levels.<sup>248</sup> The then Housing Minister, Alok Sharma, told us that a code of practice was “absolutely one of the things we are considering” and that “ultimately, what we want to see is transparency in the system, for people to know upfront what the costs are, and for those costs and charges to be reasonable”.<sup>249</sup>

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242 Q28

243 Q164

244 Law Commission, [Event Fees in Retirement Properties](#), March 2017

245 Associated Retirement Community Operators [[HOP 012](#)]

246 Q100

247 Law Commission, [Event Fees in Retirement Properties](#), March 2017

248 ARCO, [The ARCO Consumer Code](#), December 2017

249 Q268

100. In addition to a code of practice on event fees, we heard that greater transparency could be provided through specific regulation of retirement communities (extra care housing),<sup>250</sup> as is the case in New Zealand where this type of housing is particularly popular. Referring to New Zealand, Dr Beach said:

The fact that there has been so much development there is attributed to the Retirement Villages Act 2003, which set up a number of guidelines for what a retirement village has to be and has to offer. Within that are extensive provisions around better consumer protection, essentially. It says what information must be provided to the individual, outlining how any of the fees and all of that structure will be before they move in. An innovative feature is that everyone who moves in is required to receive independent financial advice before they sign any contract, so they understand everything.<sup>251</sup>

101. **We believe that concerns about the cost of and costs associated with specialist housing, as well as its resale value may deter older people from purchasing this type of property. Greater transparency on charges and payment models, particularly event fees, linked to wider availability of advice, would help to improve consumer confidence in this area. We therefore recommend that the Government should accept the Law Commission's recommendations on event fees and give legislative backing to its proposed code of practice. In addition, consideration should be given to introducing a legislative framework for extra care housing (as has been introduced in New Zealand) to bring together regulations relating to the provision of housing, care, and other support services.**

### **Sheltered rent**

102. In September 2016, the Government announced proposals for a new funding model for supported housing from April 2019. Under the new model, core rent and service charges would be funded through Housing Benefit or Universal Credit up to the level of the applicable Local Housing Allowance (LHA) rate. For costs above the LHA rate, the Government would devolve ring-fenced top-up funding for disbursement by local authorities. Our predecessor committee held a joint inquiry with their Work and Pensions Committee counterparts to scrutinise these proposals. The committees heard that the LHA rate was an inappropriate starting point for a new funding mechanism for supported housing and recommended in their report that the Government introduce “a Supported Housing Allowance, banded to reflect the diversity of provision in the sector and sufficient to ensure supported housing tenants will only require recourse to top-up funding in exceptional circumstances”.<sup>252</sup>

103. Given that the vast majority of supported housing (71%) is for older people,<sup>253</sup> we intended to return to the issue in this inquiry. However, on 23 October 2017, soon after starting work on this inquiry, the Prime Minister announced that the Government will not apply LHA rates to tenants in supported housing or the wider social rented sector and that, for sheltered and extra care housing, a ‘Sheltered Rent’, which would keep funding for

250 Q121

251 Q30. See also Michael Voges at Q118

252 Communities and Local Government and Work and Pensions Committees, [Future of supported housing: First Joint Report of the Communities and Local Government and Work and Pensions Committees of Session 2016–17](#), May 2017

253 DCLG and DWP, [Supported Accommodation Review](#), November 2016



this provision within the welfare system, would be introduced. This was a welcome move, and we are pleased that the Government listened to our predecessors' recommendation. Anchor, Hanover and Housing and Care 21, three providers of sheltered housing who submitted supplementary evidence after the announcement, said that the concept of sheltered rent "appears to recognise the essential and varied role that this type of housing plays for older people" and acknowledges the difference in the model required for this group of people.<sup>254</sup> However, they went on to say that there was still a "significant volume of detail missing" which requires "urgent clarification if the proposals are to result in new investment in older people's homes".

104. We sought to clarify some of the detail with the then Local Government Minister, Marcus Jones, when he appeared before us. The Minister told us that, although there was "a lot of work still to be done", he was "confident" that the sheltered rent would "reflect the true cost of providing sheltered and extra care housing across the country but also looks to reflect what the future cost will be".<sup>255</sup> He also said that all properties currently considered to be sheltered and extra care housing "will go into the system on day one at the same rent point". When we asked when the sector could expect formal confirmation of the detail of the sheltered rent proposal, he said that it would be "as soon as practicable"<sup>256</sup> and, when pressed, that it would be "in the not too distant future".<sup>257</sup> **We welcome the announcement of a 'sheltered rent' and the additional information offered by the Minister in oral evidence. Once its discussions with the sector are complete, the Government should confirm as soon as possible how sheltered rent will work in practice, in particular:**

- *The evidence base used to set the sheltered housing rent;*
- *How the rent will increase in future years and what provision is being made for an increase in supply;*
- *Whether all the schemes currently defined as sheltered housing will be eligible for sheltered rent; and*
- *What transitional arrangements will be put in place.*

## Bungalows

105. Bungalows are popular among older people but are in short supply.<sup>258</sup> Central Bedfordshire Council's survey of the housing needs of older people (600 short and 80 in-depth surveys) found that 61% of respondents wanted to move to a bungalow. The Council said:

There was a strong preference for bungalows with all other options trailing some way behind. This is not surprising as people are seeking to overcome the perceived disadvantages of their current home (difficulty managing stairs, costs associated with over-occupation) whilst retaining the advantages that caused them to choose that type of housing in the first place (personal space, privacy and control).<sup>259</sup>

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254 Anchor, Hanover and Housing and Care 21 [[HOP 031](#)]

255 Q286

256 Q289

257 Q290

258 Q137

259 Central Bedfordshire Council [[HOP 011](#)]

This preference was shared by the contributors to our forum, many of whom wanted to move to a bungalow but found them either to be too expensive or not available in their area. When we asked why bungalows were so popular, Claudia Wood of Demos said that it was because they were familiar and older people were not very aware of other housing options which provided similar features, such as apartments.<sup>260</sup>

106. One contributor to the forum observed that “new build estates do not seem to include any/many bungalows”. We heard that the larger land requirement for a bungalow makes them unpopular with developers. Nottingham City Homes said “given the choice, a private developer will normally choose any property type other than a bungalow to build, in order to maximise return from the footprint of the development site”.<sup>261</sup> Claudia Wood said:

In London and the south-east, where land prices are so high and space is at such a premium, to suggest we can build enough bungalows for all the old people who want them—it is not going to happen. Planning rules would not allow you to have that sort of footprint. That is why trying to capture what it means to live in a bungalow, in terms of some outside space, all one area, open plan, easily accessible, in alternative village-type designs or apartment-type designs, is the way forward.<sup>262</sup>

107. However, we heard that councils were building bungalows in response to demand from their older residents. Nottingham City Homes said that it was building bungalows:

On small plots of land on housing estates (often former lock up garage sites) that are unused and have previously attracted anti-social behaviour. Such sites are not generally attractive to commercial developers, but provide an important supply of land for modest scale schemes. In our current building programme NCH has built or has in the pipeline 123 bungalows on 13 sites across Nottingham. Virtually all current bungalow development in the city is being led by NCH.<sup>263</sup>

In addition, we note that Birmingham and Newcastle City Councils are building bungalows, and Birmingham City Council has built ‘dormer bungalows’ (ground floor bedroom and shower room, a lounge and kitchen and also a second bedroom and bathroom upstairs) in order to “make the most efficient use of available development site opportunities”.<sup>264</sup>

***While better provision of advice and information about other housing options may encourage older people to consider alternative options, we believe that, given the enduring popularity of bungalows among older people and their accessibility features, more councils and developers should consider the feasibility of building bungalows.***

## Cohousing

108. Cohousing is considered an ‘alternative’ approach to housing. Anna Kear, Executive Director of the UK Cohousing Network, introduced us to the concept:

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260 Q18

261 Nottingham City Homes [[HOP 067](#)]

262 Q19

263 Nottingham City Homes [[HOP 067](#)]

264 LGA, [Housing our ageing population](#), September 2017

Cohousing is quite different. These are intentional communities created and run by their residents. This makes them different from the usual approach that you see to providing housing for older people. This is about older people taking control and deciding how they want to live. It is about people planning ahead and making their vision for how they want to live happen, and they are actively involved in that in the long term.<sup>265</sup>

In terms of the physical set up, a cohousing community might consist of a common house, with communal facilities such as a kitchen, dining room and lounge, surrounded by private houses and a garden. While there are only a few schemes in the UK specifically for older people, for example 'New Ground' Older Women's Cohousing Community (OWCH) in High Barnet, they are more common abroad, particularly in Denmark and The Netherlands. Maria Brenton, Cohousing Consultant to OWCH, explained the way of life at New Ground:

They live as an entirely self-managing group. They age range is 51 to 88, so quite wide. They manage every aspect of the building and of living there together as a group. They have cooking, cleaning and garden rotas. They have a communal meal at regular intervals.<sup>266</sup>

We heard that the regular social interaction provided by cohousing guarded against loneliness and communal meals ensured that residents ate well.<sup>267</sup> In addition, should a member of the group need care, support was hand with shopping, cooking and generally "looking out for people".<sup>268</sup>

109. Wanting to understand why there were so few examples of cohousing in the UK and why it had taken 18 years for New Ground to come to fruition, we asked witnesses what was preventing the establishment of more communities despite the demand for them.<sup>269</sup> Anna Kear of the UK Cohousing Network said there were "an awful lot of barriers. The fundamental one is cultural. We are not used to people doing things for themselves, and certainly not housing and housing development".<sup>270</sup> We also heard that there were issues with the planning system and land allocation, as well as the tax applied during the process of buying land and development.<sup>271</sup> In November 2017, the Government increased the Community Housing Fund, which provides capital and revenue funding for community-led housing projects including co-ops, community land trusts and cohousing, by £60 million each year until 2019–20. Anna Kear said that the funding would help to redress the balance of the current system towards large housebuilders and local authority housing associations and provide groups with access to professional technical skills and support.<sup>272</sup>

**The Government's continuing support for cohousing through the Community Housing Fund is welcome. We recommend that, alongside this, the Government, in partnership with the UK Cohousing Network, should produce guidance for local authorities on supporting cohousing groups through the planning system.**

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265 Q222

266 Q222

267 Melissa Fernández and Kath Scanlon [\[HOP 030\]](#)

268 Q228

269 Q224

270 Q229

271 Q229

272 Q229

## Housing design

110. Older people's housing is often easily identifiable. We put this to Paul Teverson of McCarthy and Stone who agreed that there was a "synergy" between McCarthy and Stone developments of the 80s and 90s<sup>273</sup> and to Patrick Manwell, Consultant at Archadia Architects, who said that you could "spot retirement schemes [ ... ] a mile off".<sup>274</sup> However, we heard that older people now expected good design.<sup>275</sup> Mr Teverson said that, accordingly, there needed to be "innovation and excitement" in retirement housing and that it had to be an "aspirational move".<sup>276</sup>

111. Julia Park of Levitt Bernstein explained what good design entailed and why it was important in older people's housing:

It is not just about how something looks; it is about how it functions, how flexible it is, its technical performance, its environmental sustainability and how long it lasts [ ... ] It makes an enormous difference when homes are well designed in that all-round sense to all of us, but particularly to older people, partly because we spend so much longer in our homes when we are older and partly because we cannot reach so far or bend down so far.<sup>277</sup>

**We agree that the functional and accessible aspects of design need to be balanced with aesthetics. However, the evidence about the lack of attractive housing options for older people would suggest that this balance is not being achieved.** We felt this was evident in the accessible flats we visited at Goodrich Court in Hounslow. While spacious and functional for people with mobility needs and wheelchair users, there may be merits in such developments giving more emphasis to aesthetic design. We thought that the flats at Priory View, the extra care scheme we visited in Dunstable, which was also built to accessible standards, achieved this better. We were impressed with the thoughtful design of the building: light and airy communal areas, flats with kitchen windows looking out on to 'streets', lots of outdoor space and shops and a café open to the public. We note that Priory View followed the HAPPI (the Housing our Ageing Population Panel for Innovation) design criteria for older people's housing. The principles reflect good design generally but have particular relevance to older persons' housing: for example, space and flexibility, daylight in the home and in shared spaces, balconies and outdoor space and adaptability and 'care ready' design. Maria Brenton of the Older Women's Cohousing Group said that the group was involved designing the buildings for their cohousing community and that they have "loads of space, lots of big windows, very generous balconies, loads of storage—all the things that most developers do not think necessary to put into older people's housing".<sup>278</sup> ***We believe that developers of specialist and accessible housing should be more ambitious in the design of their housing and should make use of the HAPPI (the Housing our Ageing Population Panel for Innovation) design criteria for older people's housing. Local authorities and housing associations should require developers to involve older people in the design process, to better reflect their needs.***

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273 Q87

274 Q234

275 Q81

276 Q87

277 Q81

278 Q235

## 7 Planning and supply of homes for older people

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112. We discussed the demand for and shortage of specialist homes in paragraphs 85 to 86. When we asked why developers of specialist housing were not delivering more homes in response to demand, Paul Teverson of McCarthy and Stone said “there is absolutely a market failure [ ... ] it can only be the planning system that is the cause of that”.<sup>279</sup> We consider the impact of national and local planning policy on the delivery of housing for older people in this chapter.

### National planning policy

113. The National Planning Policy Framework (NPPF) and associated guidance asks local planning authorities to plan housing based on current and future demographic trends. The then DCLG said:

Paragraphs 47 and 50 of the NPPF is explicit that local planning authorities should plan for a mix of housing based on current and future demographic and market trends. In doing so they should address the needs for all types of housing and the specific needs of different groups in the community, including older people.

Paragraph 159 of the Framework provides more detail of the evidence that local planning authorities should produce as they prepare their Local Plan. It makes it clear that local planning authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs [ ... ] This should take account of migration and demographic change and address the need for all types of housing, including the needs of different groups in the community such as older people [ ... ].<sup>280</sup>

While the Home Builders Federation said that the NPPF set a “pro-active” and “positive” approach on the need for local authorities to plan for housing for older people,<sup>281</sup> many more thought that it failed to do this. Barton Willmore LLP said that it needed to be “clearer in the provision and support for housing specifically for older people”,<sup>282</sup> Tetlow King said it lacked “detail, clarity and emphasis”,<sup>283</sup> and the Chartered Institute for Housing said it placed “limited requirements on authorities”.<sup>284</sup>

114. The commitment by the Government in the Housing White Paper to strengthen national planning policy to require local authorities to have “clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people”<sup>285</sup> was therefore welcomed, as was the forthcoming guidance for local authorities under the Neighbourhood Planning Act 2017 on addressing housing needs that result

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279 Q94

280 DCLG [[HOP 025](#)]

281 Home Builders Federation [[HOP 058](#)]

282 Barton Willmore LLP [[HOP 064](#)]

283 Tetlow King Planning [[HOP 073](#)]

284 Chartered Institute for Housing [[HOP 087](#)]

285 MHCLG, [Fixing our broken housing market](#), February 2017

from old age or disability.<sup>286</sup> The then Housing Minister, Alok Sharma, told us that the draft of the revised NPPF will be published in early 2018 and the guidance is expected to be published at the same time.<sup>287</sup> We have subsequently been told by the Permanent Secretary of the MHCLG that publication will be just before Easter.<sup>288</sup> **We believe that national planning policy should give greater encouragement to the development of housing for older people and ensuring sites are available for a wider range of developers. We recommend that, in the impending review, the NPPF should be amended to emphasise the key importance of the provision of housing for older people in both local authority plan making and decision taking.**

## Local planning policy

### Assessing housing need and land

115. Housing and Care 21 were critical of the way local authorities assessed need through their Strategic Housing Market Assessments, saying they were:

Not consistent in their treatment of housing demand overall. There are a limited number of datasets which can be used to assess demand, but these vary in their estimate and there is no overall guidance as to which dataset may be the most accurate or robust. As well as a lack of a uniform approach, many assessments simply do not consider older people's housing as a separate element, so it gets overlooked.<sup>289</sup>

We also heard that they were “sporadic and inconsistent”<sup>290</sup> and some did not adequately consider older people's housing—they “ignore it completely or solely assess the need for rented or affordable options”.<sup>291</sup>

116. We were, however, referred to examples of good practice, such as by Birmingham City Council and by Worcestershire County Council<sup>292</sup> and, during our visit, we were briefed on the robust approach taken by Central Bedfordshire Council to assessing need. They commissioned 600 short and 80 in depth independent surveys of a representative sample of older residents across all housing and tenure types. As a result, they have estimated a need for 3650 specialist dwellings and 5400 mainstream houses. The Home Builders Federation recommended that local planning authorities should assess the percentage of housing for older people needed “across all the relevant classifications [ ... ] then broken down [ ... ] according to an analysis of the local market and demographic context”.<sup>293</sup> The Department has since consulted on a new standard method for calculating local

286 Chartered Institute for Housing [HOP 087], Barton Willmore LLP [HOP 064] The Neighbourhood Planning Act has placed a duty on the Secretary of State to issue guidance on addressing housing needs that result from old age or disability (not yet published).

287 Q236

288 Communities and Local Government Committee, [Oral evidence: DCLG Annual Report and Accounts 2016–17](#), 15 January 2018, Q13

289 Housing and Care 21 [HOP 076]

290 Midland Heart [HOP 026]

291 McCarthy and Stone [HOP 059]

292 Midland Heart [HOP 026]

293 Home Builders Federation [HOP 058]



authorities' housing need, the response to which is currently awaited.<sup>294</sup> *We recommend that the new standard approach to assessing housing need explicitly addresses the complex and differing housing needs of older people.*

117. The NPPF asks local authorities to assess the quantity and suitability of land potentially available for housing development (a Strategic Housing Land Availability Assessment). Many developers said their policy was to use brownfield land because it was “in well-connected urban areas” where their customers prefer to live<sup>295</sup> and close to existing homes.<sup>296</sup> As discussed earlier, living in well-located housing close to local services and amenities makes an important contribution to older people's health and wellbeing. The Chartered Institute for Housing said that the Government should encourage local authorities to identify suitable sites, particularly “small infill or brownfield sites well located within existing settlements and well connected to transport and with local facilities”.<sup>297</sup>

### Local Plans

118. We heard that Local Plans and local planning policies often failed to plan for older people's housing<sup>298</sup> and we recall Habinteg's evidence that many councils were also not planning for accessible housing.<sup>299</sup> We asked Paul Teverson whether this was McCarthy and Stone's experience. He said:

On the question of whether local councils plan for this form of housing, the answer is largely no, which is a real shame. There are three reports we always refer to, one by the HCA in 2014, which found that just 14% of local councils were planning for retirement housing across all sectors. There was also a Barton Willmore study in 2015 that said only 20% of councils were doing it, and an Irwin Mitchell study that said only 10%, so we think the figure is somewhere between 10% and 20%.<sup>300</sup>

119. However, we also heard examples of some Local Plans requiring 10% of all new housing to be built specifically for older people<sup>301</sup> and that several authorities in the North West were “requiring all new developments over 15 units in to include 20% of the stock for older people”.<sup>302</sup> Graham King, Head of Integrated Commissioning at Sunderland City Council, explained why his council had been particularly successful at increasing housing for older people:

There is definitely a brand: Sunderland is open for business [ ... ] We make reference to specialist housing for all vulnerable people—not just older persons—in our Local Plan. Our housing strategy has a chapter dedicated to specialist housing for vulnerable people and older people, and we have regular engagement with developers bringing forward land sites and so on. Sunderland is quite unique in that regard.<sup>303</sup>

294 DCLG, [Planning for the right homes in the right places](#), 14 September 2017

295 McCarthy and Stone [[HOP 059](#)]

296 Nottingham City Homes [[HOP 067](#)]

297 Chartered Institute for Housing [[HOP 087](#)]

298 See, for example, British Property Federation [[HOP 062](#)], ARCO [[HOP 060](#)], Barton Willmore LLP [[HOP 064](#)]

299 Habinteg [[HOP 029](#)]

300 Q91

301 Barton Willmore LLP [[HOP 064](#)]

302 Manchester Metropolitan University and others [[HOP 053](#)]

303 Q93

Similarly, Central Bedfordshire has published information about its housing for older people strategy, area demographics and market opportunities in an ‘investment prospectus’ for developers.<sup>304</sup>

120. Michael Voges of ARCO said that some local authorities were more receptive to developers of affordable extra care housing than private housing (we discussed the particular shortage of privately developed specialist homes at paragraph 86). Mr Voges attributed this in part to the fact that affordable extra care housing was “replacing care home obligations for their local social services departments, and getting people out of larger mainstream homes”.<sup>305</sup> In contrast, they saw private housing as potentially bringing older people to their area. Paul Teverson of McCarthy and Stone said:

There is a misconception [ ... ] that we are dragging in older people from other boroughs who are going to clog up your social care system and your GP practices. In reality, our average mover is coming from four miles away, so they are living within the district. Even if they were not, it is still their prerogative to move.<sup>306</sup>

In fact, as discussed in paragraphs 87 to 91, specialist housing has well-evidenced health and wellbeing benefits and can lead to reduced health and social care costs. Some local authorities, like Sunderland City Council and Central Bedfordshire Council, have joined up their planning, housing and health and social care teams so they are therefore able to assess the health and social care benefits of having appropriate accommodation for older people.<sup>307</sup> However, we heard that this kind of joint working was rare.<sup>308</sup>

121. We asked the then Housing Minister, Alok Sharma, how the Neighbourhood Planning Act 2017 guidance would encourage local authorities to develop housing for older people. He suggested it would be “very specific in terms of their plans, in terms of location but also in terms of quantum”.<sup>309</sup>

**122. We believe that older people should be able to choose from a wide choice of housing which can accommodate their needs and preferences. This will include, across the social and private sectors, smaller, or better designed, general needs housing, accessible housing, specialist housing, including retirement homes and extra care housing, and cohousing. To enable them to make this choice, and move to a home which better suits their needs, the guidance required under the Neighbourhood Planning Act 2017 should recommend that:**

- ***Local authorities produce and publish a strategy explaining how they intend to meet the housing needs of older people in their area, including the scale and mix of housing and the tenures needed, and setting out the evidence relating to current housing need.***
- ***Local Plans should, based on an assessment of local need, identify a target proportion of new housing to be developed for older people and identify suitable***

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304 Central Bedfordshire Council, [Meeting the Accommodation Needs of Older People in Central Bedfordshire: Investment Prospectus 2016–2020](#), July 2016

305 Q91

306 Q91. See also Dr Brian Beach at Q17

307 Sunderland City Council [[HOP 035](#)]

308 Q93

309 Q272



*well-connected sites, close to local amenities. They should identify a range of different types of housing, including accessible homes, extra care housing and smaller mainstream homes to be built. The number of homes developed against this target should be published each year.*

- *There should be greater collaboration within local authorities between planning, social care, health and housing teams, particularly on the production of Local Plans. Local authority planning, health and social care teams should work together to assess the savings to health and social care budgets which may arise from additional specialist housing in their area and consider this in the context of negotiations over planning charges.*
- *Local authorities should be more receptive to private developers who wish to build housing for older people in their area, and appreciate the potential health and wellbeing benefits leading to reduced need to health and social care services to be gained.*

## Viability

123. Developers of specialist housing providing evidence strongly emphasised the different development economics they faced in comparison to developers of general needs housing.<sup>310</sup> The Home Builders Federation said developers “struggle to compete” because their overall “gross development value” is higher. They identified the following characteristics of specialist housing as significant in this:

- Less saleable space as a result of communal areas;
- Larger gross internal area, as a result of communal areas, attracting higher Community Infrastructure Levy (CIL) and section 106 charges;
- Higher density, which attracts higher CIL and section 106 charges;
- Lack of pre-sales (the communal areas must be complete and operating before anyone moves in);
- Little or no phasing;
- A cost to the developer when units remain unsold as they must maintain all services; and
- Higher build costs.<sup>311</sup>

124. We also heard that the price of brownfield land, which developers prefer for the reasons considered above, can be driven up through competition with commercial developers.<sup>312</sup> We received most evidence about the impact of CIL, payable on development which create net additional floor space, where the gross internal area of new build exceeds 100 square

310 Audley Retirement [[HOP 018](#)], Churchill Retirement Living [[HOP 025](#)], Anchor [[HOP 042](#)], McCarthy and Stone [[HOP 059](#)], Home Builders Federation [[HOP 058](#)]

311 Home Builders Federation [[HOP 058](#)]

312 Q103. See also Churchill Retirement Living [[HOP 025](#)]

metres. Although developers may also pay contributions under section 106 agreements towards infrastructure and affordable housing, Paul Teverson of McCarthy and Stone explained that CIL was particularly onerous for developers of specialist housing:

CIL is a flat-rate square metre tax, which means that we would pay that tax on all of our shared areas where we provide restaurants, homeowners' lounges and our slightly larger corridors to meet wheelchair accessibility standards.<sup>313</sup>

He went on to say that the current system of planning charges were “purely designed around working with mainstream housing”.<sup>314</sup> Claudia Wood of Demos said that economic modelling that she had undertaken for a forthcoming piece of research had shown that the planning charges on specialist housing “make a lot of developments completely unviable”.<sup>315</sup> She continued: “the developers we spoke to all said that, of 30 or 40 sites they looked at, they could maybe find one that they could build on to make the numbers work”. While we heard it was possible for developers to negotiate, this added costs and led to delays.<sup>316</sup> Recognising that they “absolutely save money in the longer term”,<sup>317</sup> Graham King of Sunderland City Council said that his council had taken a different approach to developer contributions on extra care schemes built on their land. He said:

We do take 106, but we have also had some models for our care schemes where we have looked at a best value principle. We have actually put in the value of the land on some schemes, because we have been able to prove longitudinally over 10 to 15 years that the savings on the adult social care and health budget have been much grander than the potential value of the land.<sup>318</sup>

McCarthy and Stone called for a “social care credit” to be applied on planning charges accruing to specialist housing developments.<sup>319</sup>

125. We also heard that the “inconsistent and cumbersome” application of the C2 and C3 planning classifications to extra care housing was problematic for developers.<sup>320</sup> Some local authorities apply the C2 classification, applied to residential care homes and nursing homes, to extra care housing which reduces planning charges. Others classify this type of housing as C3, along with mainstream housing, which means full charges apply. Audley Retirement argued that extra care housing should fall within the C2 class:

Extra care is set up to fulfil many of the functions that care homes can provide in terms of care delivery as and when the resident requires it, monitored by an onsite care team and there is access to communal facilities. There are controls over who can occupy them by age and a need for care that do not exist on C3 standard dwellings.<sup>321</sup>

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313 Q97

314 Q97

315 Q25

316 Home Builders Federation [\[HOP 058\]](#), McCarthy and Stone [\[HOP 059\]](#)

317 Q112

318 Q109

319 McCarthy and Stone [\[HOP 059\]](#)

320 ARCO [\[HOP 060\]](#). See also Anchor [\[HOP 018\]](#)

321 Audley Retirement [\[HOP 018\]](#)

Extra care housing developers had a range of suggestions for countering this issue: an “extension and additional clarity” on C2 so that it captures extra care housing;<sup>322</sup> the creation of a sub-section of C2 which attracts lower planning charges;<sup>323</sup> and the creation of a “dedicated use class” for extra care housing which would enable planning contributions to be streamlined.<sup>324</sup>

126. When we asked about this, the then Housing Minister, Alok Sharma, told us that the guidance will look at the “precise terminology that is used to describe the different types of older people’s housing”.<sup>325</sup> **We believe that the level of planning contributions on specialist housing, which are increased as a result of the non-saleable communal areas which are a feature of this type of housing, is impeding the delivery of homes. We recommend either the creation of a sub-category of the C2 planning classification (which currently applies to residential care and nursing homes) for specialist housing, which would reduce the contributions required from developers, or the creation of a new use class for specialist housing which would have the same effect.**

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322 Anchor [[HOP 018](#)]

323 Home Builders Federation [[HOP 058](#)]

324 ARCO [[HOP 060](#)]

325 Q272

## 8 Conclusion: A national strategy

127. The terms of reference for this inquiry asked whether a national strategy on housing provision for older people was needed. The vast majority of those responding said yes,<sup>326</sup> and we have decided to endorse their view. It is a well-known fact that our society is ageing, with 18% of people aged 65 and over and 2.4% aged 85 and over in 2016,<sup>327</sup> and the proportion of people aged 85 projected to double over the next 25 years.<sup>328</sup> While this is something to be celebrated, it also presents challenges as people's housing needs and preferences change as they grow older and they may want to make changes to the way they live. This is compounded by the fact that older people's housing needs and options will be diverse in terms of tenure, geographical location, income, equity and individual choice. Furthermore, as the number of issues tackled in this report demonstrates, this is a broad and complex area of policy. *We therefore recommend that the Government introduces a new national strategy for older people's housing, which takes into account the recommendations made in this report. It should be established in consultation with older people and those who provide for them. The strategy should bring together and improve the aspects of policy affecting housing for older people and, recognising the link between housing and health, be closely linked with the social care green paper and the Government's future work on social care.*

326 See, for example, Home Builders Federation [[HOP 058](#)], Age UK [[HOP 085](#)], Housing LIN [[HOP 012](#)], Care and Repair [[HOP 013](#)], Northern Housing Consortium [[HOP 026](#)]

327 ONS, [Overview of the UK population: July 2017](#), July 2017

328 ONS, [National Population Projections: 2016-based statistical bulletin](#), October 2017

## Conclusions and recommendations

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### Advice and information

1. Access to good quality information and advice is fundamental to helping older people make informed, planned and timely choices about how and where they live in later life, and to helping them to live healthily and comfortably wherever they choose to do so and to make the most of their financial resources. (Paragraph 10)
2. We believe that the FirstStop Advice Service currently led by the Elderly Accommodation Counsel (EAC) should be expanded. Although we acknowledge that there is a considerable amount of useful advice available online, we are concerned that this is not accessible to many older people who may require information and advice in person. We recommend that the EAC should be re-funded by the Government to provide an expanded national telephone advice service (referred to from now on as “the national advice service”), supported by advice online, in hard copy advice and other accessible formats. Advice provided should be holistic, covering the range of issues relating to housing for older people as follows:
  - Repairs, maintenance and adaptations, and access to funding for these;
  - Home improvement agencies (HIAs), handypersons, trusted traders;
  - Heating and energy efficiency;
  - Housing options, including specialist housing;
  - Moving home, including the practical and financial aspects of moving;
  - Care options and financing of care; and
  - Signposting to appropriate agencies for advice on housing finance: mortgages, equity release, Help to Buy and shared ownership (for example, the single financial guidance body). (Paragraph 11)
3. The national advice service should maintain and extend its links with local authorities, HIAs and other local charities and partners so it can direct people to advice and practical help locally. Furthermore, the national advice service, and the linked organisations, should be consistently branded and advertised by a Government-backed campaign to raise awareness and promote the creation of a ‘trusted network’. (Paragraph 12)

### The link between housing and health

4. For older people, living in a cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression. This has resultant costs to the NHS and social care. The problem is exacerbated by the fact that older people spend longer at home and may be living on a low income in homes that harder to heat. We recommend that the national advice service should partner with and signpost older people to the Energy Saving Trust’s telephone advice line. In addition, we

recommend the Government consider developing a national scheme to help older people in fuel poverty and, as part of this, it may wish to consider schemes similar to the Affordable Warmth Scheme in Northern Ireland and Wales. (Paragraph 16)

5. The consequences of falls at home caused by often trivial hazards can be catastrophic, precipitating serious decline in older people's physical and mental health. There needs to be a national and local drive to address falls and accidents in the home. This should include provision of better advice and information about repairs, maintenance and adaptations (paragraph 11), wider access to the services of Home Improvement Agencies and handypersons to facilitate adaptations (paragraph 34) and more timely implementation of, and flexible use of, Disabled Facilities Grants (paragraph 43). In addition, integrated working on health and social care should include working with housing partners to identify homes with falls and accidents risks and intervening to remove them. (Paragraph 18)
6. Social isolation can lead to poor mental and physical health. Ensuring that older people's housing is within easy reach of local services, amenities and public transport links is therefore critical, and we consider the location of new housing for older people further in paragraph 118. Loneliness is harder to tackle. We support the recommendations of the Jo Cox Commission's Call to Action, including a UK wide Strategy for Loneliness across all ages and a programme to develop the evidence around 'what works' in tackling loneliness, and welcome the Government's recent appointment of a 'Minister for Loneliness'. (Paragraph 20)
7. There is a well-evidenced link between housing and health and wellbeing, and the consequent costs of treatment by the health service. Poor quality, un-adapted, hazardous, poorly heated and insulated accommodation can lead to reduced mobility, depression, chronic and acute illness and falls and social isolation to loneliness and depression. We recommend that prevention, early intervention and promotion of health and wellbeing through housing should be a priority for the national advice service. It should refer people to where they can get practical help to improve the quality of their home and to their local authority and health service if more immediate, direct intervention is needed. In this context, we note that (Paragraph 23)
8. The need to integrate housing services with health and social care services has been recognised in the care and support statutory guidance and the Department of Health, Ministry of Housing Communities and Local Government and NHS England supported 2014 Memorandum of Understanding to support joint action on improving health through the home. We believe that, given the health consequences of unsuitable housing, this should be reflected better at local level. Housing services should take equal status to health and social care services in the planning and implementation of closer working and in Sustainability and Transformation Partnerships (STPs) and Accountable Care Systems (ACSs). The Government should monitor the extent to which STPs and ACSs include plans for closer working between housing, health and social care organisations and include mechanisms to address housing issues having a direct impact on residents' health outcomes. The Government should, where necessary, make representations to such organisations to ensure that housing is included in STPs and ACSs. (Paragraph 26)

9. The right kind of housing can keep people healthy, support them to live independently and reduce the need for home care or residential care. The social care green paper, planned for publication in summer 2018, must consider the range of housing for older people, from mainstream and accessible homes to supported and extra care housing, as well as access to adaptations and repairs. In particular, the social care green paper should consider the role of extra care housing in the provision of social care alongside domiciliary and residential care. (Paragraph 27)

### Staying put

10. We believe that this is a false economy. Home Improvement Agencies (HIAs) and handyperson services are good value for money, contributing to keeping older people healthy, safe and independent at home. The Government should make additional funding available for the expansion of HIAs so that there is at least access in each local authority area to one agency which operates a full range of services, including a handyperson service. (Paragraph 34)
11. Current schemes which check and endorse tradespeople, such as the Government endorsed scheme, 'TrustMark', should consider developing a specific accreditation for traders who have been reviewed by older people or their relatives and proven to be trusted. Once accredited, the trader would be permitted to display the branding used by the national advice line and linked organisations alongside their own logo. (Paragraph 35)
12. Equity release and re-mortgaging are possible routes for older owner occupiers to fund large repairs or adaptations to their homes. Mortgage providers and members of UK Finance and the Equity Release Council should work to ensure these products are tailored to the needs of older people. We make a specific recommendation on the provision of joined up advice on equity release and mortgages in paragraph 60. (Paragraph 39)
13. The DFG has a very important role to play in making older people's homes accessible and enabling them to maintain their independence. We welcome the Department's commitment to review the operation of the DFG and recommend the review should also look specifically at:
  - Ensuring that adaptations are implemented within a reasonable period of time;
  - How to encourage local authorities to innovate in their approach to implementation; and
  - The level at which the cap is set. (Paragraph 43)
14. Private renting is an increasingly important housing option for older people and they should feel confident in being able to adapt their home to meet their needs. We recommend that the review of the DFG should consider how to ensure that older tenants in the private rented sector secure the adaptations they need. In particular, it should consider the case for allocating government funding to local authorities to make discretionary payments to landlords for the costs of reinstatement or removal of the adaptation once the tenancy has ended. (Paragraph 45)



## Moving home

15. Many older people would like to move in later life but often the physical, financial and emotional aspects of moving home prevent or delay them from doing so, and we heard that many of those who do move often wished they had done so sooner, often “five to 10 years earlier”. The national advice service should provide information and advice on moving, including the practical aspects of moving and where to obtain help with this; housing options; and finance, including mortgages, help to buy and shared ownership. (Paragraph 48)
16. Moving home requires a significant amount of physical resource particularly for older people who may have less energy, health needs and a lifetime’s worth of belongings to pack and unpack. We recommend that the national advice service should consider how best to gather information about local organisations which can provide practical help with the moving process (decluttering, disposing of unwanted items, packing and unpacking, removals and cleaning) and, where possible, signpost people to these organisations. Furthermore, trade and professional bodies involved in the home buying and selling process, such as The British Association of Removers, NAEA Propertymark, The Law Society and the Royal Institution of Chartered Surveyors, should consider creating an accreditation for their members which provide tailored services for older people. Once accredited, firms would be permitted to display the branding used by the national advice line and linked organisations. (Paragraph 51)
17. The Government’s commitment to improving the home buying and selling process is welcome and, given the Minister’s evidence, we expect to see particular consideration given to how the process can be improved for older people. (Paragraph 52)
18. We have carefully considered calls for a stamp duty exemption for older people but are not convinced that this would enable many more people to move. Many older home owners are likely to receive a capital gain when they move that will cover the cost of the stamp duty payable on their new home. In addition, we believe that an exemption would be extremely difficult to implement. We believe that stamp duty is not the main barrier to older people moving home and that there are many other practical, emotional and financial factors which act to deter people from doing so. (Paragraph 55)
19. A small but increasing number of older people take out a mortgage beyond retirement age. They may have more success obtaining advice from a mortgage broker, who can better assess their personal financial circumstances, than approaching a high-street lender directly. We recommend that the Government should encourage lenders to improve the service they provide to older customers. This should entail the provision by high street lenders of clearer guidance, on their website and in the literature available in the branch, on their policy with respect to lending to older people. We also recommend that, where an older person who applies for a mortgage or re-mortgage is rejected, the lender should routinely refer them to another lender, a mortgage broker or, once established, the single financial guidance body for advice (see paragraph 60). (Paragraph 58)



20. The Government and UK Finance should together consider what steps can be taken to increase lenders' confidence in lending on the purchase of specialist housing. The Government's acceptance of the Law Commission's recommendation for a code of practice on event fees and specific legislation for the extra care housing sector (discussed in paragraphs 98 to 101) may also help to sustain resale values, thereby boosting lenders' confidence. (Paragraph 59)
21. We recommend that the single financial guidance body, for which the Financial Guidance and Claims Bill (Lords) will legislate, should be made responsible for providing specialist advice tailored to the financial circumstances of older people. It should signpost older people to mortgage brokers, banks and building societies who can offer advice on mortgages and equity release, shared ownership and shared equity, and on re-investing the proceeds of sales. The national advice service should be closely linked to the single financial guidance body and signpost people seeking housing finance advice to it. (Paragraph 60)
22. Owner-occupiers in low-value housing or in poor condition may not be able to move unless they can access social rented housing or shared ownership. Both shared ownership and Help to Buy could play a more important role in enabling older people to afford to purchase a mainstream home or release equity when they move. We recommend the Government should ensure that providers and lenders make these home ownership options available and transparent for older people and address perceptions that Help to Buy is aimed at first time buyers. We also recommend that the Government should work with lenders and housing providers to ensure one model for shared ownership which would encourage more lenders to offer mortgages, thereby widening access to this initiative, and consider how shared equity can be used for specialist housing. (Paragraph 63)
23. We believe that the options for older social tenants who wish to move are limited. There are wider social advantages in enabling this group to move if they wish to do so, namely the health and wellbeing benefits that can result from more appropriate accommodation and the fact that it can free up homes for families waiting to move. More of all types of housing for older people—extra care, sheltered and accessible housing—need to be built across the social and private sectors. (Paragraph 69)
24. We heard frequent claims that older people moving home in later life could be part of the solution to tackling the housing shortage but little real evidence to support this. We believe that this issue warrants further investigation as there may be wider social advantages in older people moving to a smaller home that better suits their needs. The Government should commission independent research to investigate the impact of 'rightsizing' on the housing market. This research should aim to provide a better understanding of how many older people move, where they move to, who moves into the homes they vacate and to what extent this helps to satisfy local demand for homes. (Paragraph 73)

### Housing options

25. We believe that mandatory Category 1 standard is too low and that all new homes should be built to be 'age proof' for the current and future needs of an ageing population. We recommend therefore that the baseline standard for all new homes

should be Category 2. The Government should work with local authorities to collect data on the number of homes built to Category 2 and 3 standards and require that homes built to such standards are advertised as such in sales and lettings literature so they are easily identifiable. (Paragraph 81)

26. We recommend that local authorities ensure their accessible housing register or comparable system is comprehensive and up-to-date and keep track of stock which has undergone significant adaptation so that it can be matched in the future to the needs of new occupants. They should also ensure that housing occupational therapists, surveyors and housing associations feed into the information gathering process. (Paragraph 82)
27. The current array of terms used to describe the different types of specialist housing is confusing, although what is provided is diverse. This makes it difficult for people to understand what is on offer and make comparisons, and may ultimately be off-putting for people interested in this type of housing. We note that the success of specialist housing in other countries may be due to having a “consistent concept” of what is on offer. The Government should instigate discussions between developers and providers of specialist housing with the aim of agreeing on a consistent terminology to describe the housing and related services on offer. (Paragraph 84)
28. We believe that, in the face of demand, there is a shortfall in supply of specialist homes in general and particularly for private ownership and rent and for the ‘middle market’. This limits the housing options available to older people and the opportunity to derive the health and wellbeing benefits linked to specialist homes. (Paragraph 86)
29. Specialist housing, and particularly extra care housing, can promote the health and wellbeing of older people and their carers, leading to savings in spending on health and social care. We recommend that the planned social care green paper should include plans to promote awareness of this type of housing so it becomes an option for older people whose care needs are not significant enough for residential care. (Paragraph 91)
30. Registered social landlords also play a significant role in promoting the health and wellbeing of vulnerable older tenants. We believe that, as recommended by our predecessor Committee, housing associations should remain mindful of their social mission to ensure that they make best use of this position and consistent levels of service, the Government should publish standards setting out their role and responsibilities to their older tenants, including ensuring good quality, adapted (where necessary) housing and, more widely, falls and accident prevention, preventing hospital admissions and enabling prompt discharge. (Paragraph 92)
31. We believe that concerns about the cost of and costs associated with specialist housing, as well as its resale value may deter older people from purchasing this type of property. Greater transparency on charges and payment models, particularly event fees, linked to wider availability of advice, would help to improve consumer confidence in this area. We therefore recommend that the Government should accept the Law Commission’s recommendations on event fees and give legislative backing to its proposed code of practice. In addition, consideration should be given

to introducing a legislative framework for extra care housing (as has been introduced in New Zealand) to bring together regulations relating to the provision of housing, care, and other support services. (Paragraph 101)

32. We welcome the announcement of a 'sheltered rent' and the additional information offered by the Minister in oral evidence. Once its discussions with the sector are complete, the Government should confirm as soon as possible how sheltered rent will work in practice, in particular:
  - The evidence base used to set the sheltered housing rent;
  - How the rent will increase in future years and what provision is being made for an increase in supply;
  - Whether all the schemes currently defined as sheltered housing will be eligible for sheltered rent; and
  - What transitional arrangements will be put in place. (Paragraph 104)
33. While better provision of advice and information about other housing options may encourage older people to consider alternative options, we believe that, given the enduring popularity of bungalows among older people and their accessibility features, more councils and developers should consider the feasibility of building bungalows. (Paragraph 107)
34. The Government's continuing support for cohousing through the Community Housing Fund is welcome. We recommend that, alongside this, the Government, in partnership with the UK Cohousing Network, should produce guidance for local authorities on supporting cohousing groups through the planning system. (Paragraph 109)
35. We agree that the functional and accessible aspects of design need to be balanced with aesthetics. However, the evidence about the lack of attractive housing options for older people would suggest that this balance is not being achieved. (Paragraph 111)
36. We believe that developers of specialist and accessible housing should be more ambitious in the design of their housing and should make use of the HAPPI (the Housing our Ageing Population Panel for Innovation) design criteria for older people's housing. Local authorities and housing associations should require developers to involve older people in the design process, to better reflect their needs. (Paragraph 111)

### Planning and supply of homes for older people

37. We believe that national planning policy should give greater encouragement to the development of housing for older people and ensuring sites are available for a wider range of developers. We recommend that, in the impending review, the NPPF should be amended to emphasise the key importance of the provision of housing for older people in both local authority plan making and decision taking. (Paragraph 114)

38. We recommend that the new standard approach to assessing housing need explicitly addresses the complex and differing housing needs of older people. (Paragraph 116)
39. We believe that older people should be able to choose from a wide choice of housing which can accommodate their needs and preferences. This will include, across the social and private sectors, smaller, or better designed, general needs housing, accessible housing, specialist housing, including retirement homes and extra care housing, and cohousing. To enable them to make this choice, and move to a home which better suits their needs, the guidance required under the Neighbourhood Planning Act 2017 should recommend that:
  - Local authorities produce and publish a strategy explaining how they intend to meet the housing needs of older people in their area, including the scale and mix of housing and the tenures needed, and setting out the evidence relating to current housing need.
  - Local Plans should, based on an assessment of local need, identify a target proportion of new housing to be developed for older people and identify suitable well-connected sites, close to local amenities. They should identify a range of different types of housing, including accessible homes, extra care housing and smaller mainstream homes to be built. The number of homes developed against this target should be published each year.
  - There should be greater collaboration within local authorities between planning, social care, health and housing teams, particularly on the production of Local Plans. Local authority planning, health and social care teams should work together to assess the savings to health and social care budgets which may arise from additional specialist housing in their area and consider this in the context of negotiations over planning charges.
  - Local authorities should be more receptive to private developers who wish to build housing for older people in their area, and appreciate the potential health and wellbeing benefits leading to reduced need to health and social care services to be gained. (Paragraph 122)
40. We believe that the level of planning contributions on specialist housing, which are increased as a result of the non-saleable communal areas which are a feature of this type of housing, is impeding the delivery of homes. We recommend either the creation of a sub-category of the C2 planning classification (which currently applies to residential care and nursing homes) for specialist housing, which would reduce the contributions required from developers, or the creation of a new use class for specialist housing which would have the same effect. (Paragraph 126)

### Conclusion: A national strategy

41. The terms of reference for this inquiry asked whether a national strategy on housing provision for older people was needed. The vast majority of those responding said yes, and we have decided to endorse their view. It is a well-known fact that our society is ageing, with 18% of people aged 65 and over and 2.4% aged 85 and over in 2016, and the proportion of people aged 85 projected to double over the next

25 years. While this is something to be celebrated, it also presents challenges as people's housing needs and preferences change as they grow older and they may want to make changes to the way they live. This is compounded by the fact that older people's housing needs and options will be diverse in terms of tenure, geographical location, income, equity and individual choice. Furthermore, as the number of issues tackled in this report demonstrates, this is a broad and complex area of policy. We therefore recommend that the Government introduces a new national strategy for older people's housing, which takes into account the recommendations made in this report. It should be established in consultation with older people and those who provide for them. The strategy should bring together and improve the aspects of policy affecting housing for older people and, recognising the link between housing and health, be closely linked with the social care green paper and the Government's future work on social care. (Paragraph 127)

# Formal minutes

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## Monday 5 February 2018

Members present:

Mr Clive Betts, in the Chair

Mike Amesbury	Andrew Lewer
Bob Blackman	Mr Mark Prisk
Helen Hayes	Mary Robinson
Kevin Hollinrake	Liz Twist

Draft Report (*Housing for older people*) proposed by the Chair, brought up and read.

*Ordered*, That the Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 127 read and agreed to.

Summary agreed to.

*Resolved*, That the Report be the Second Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

*Ordered*, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned until Wednesday 7 February at 9.30 a.m.]

## Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

### Monday 23 October 2017

*Question number*

**Jeremy Porteus**, Director, Housing Learning and Improvement Network; **Claudia Wood**, Chief Executive, DEMOS; **Dr Brian Beach**, Senior Research Fellow, International Longevity Centre-UK

[Q1–58](#)

### Monday 13 November 2017

**Sue Adams**, Chief Executive, Care and Repair; **Andrew Gibson**, Vice Chair, Habinteg; and **Julia Park**, Head of Housing Policy, Levitt Bernstein

[Q59–81](#)

**Michael Voges**, Executive Director, Associated Retirement Community Operators; **Paul Teverson**, Director of Communications, McCarthy and Stone; and **Graham King**, Head of Integrated Commissioning, Sunderland City Council

[Q82–123](#)

### Monday 20 November 2017

**Professor Geoff Meen**, University of Reading; **Dr Peter Kenway**, Director, New Policy Institute; **John Godfrey**, Corporate Affairs Director, Legal & General

[Q124–159](#)

**John Galvin**, Chief Executive, Elderly Accommodation Counsel; **Paul Smees**, Head of Mortgages, UK Finance (incorporating Council of Mortgage Lenders); **Mark Bogard**, Chief Executive, Family Building Society

[Q160–192](#)

### Monday 4 December 2017

**Jacqueline Runnalls**, Co-opted Lead on Accessibility and Inclusive Design, Royal College of Occupational Therapists Specialist Section in Housing; **Gill Moy**, Director of Housing and Customer Services, Nottingham City Homes; **Professor Carol Holland**, Centre for Ageing Research, Lancaster University

[Q193–220](#)

**Anna Kear**, Executive Director, UK Cohousing Network; **Patrick Manwell**, Consultant Architect, Archadia; **Maria Brenton**, Cohousing Consultant to the Older Women's Cohousing Community

[Q221–235](#)

### Monday 11 December 2017

**Alok Sharma MP**, Minister of State for Housing and Planning, Department for Communities and Local Government and **Mr Marcus Jones MP**, Minister for Local Government, Department for Communities and Local Government

[Q236–295](#)

## Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

HOP numbers are generated by the evidence processing system and so may not be complete.

- 1 Anchor, Hanover and Housing & Care 21 ([HOP0031](#))
- 2 Anchor, Hanover and Housing & Care21 HAs ([HOP0013](#))
- 3 ARCO (Associated Retirement Community Operators) ([HOP0012](#))
- 4 Central Bedfordshire Council ([HOP0011](#))
- 5 Country Land and Business Association ([HOP0008](#))
- 6 DCLG ([HOP0025](#))
- 7 East Thames ([HOP0029](#))
- 8 Elderly Accommodation Counsel ([HOP0037](#))
- 9 Equity Release Council ([HOP0035](#))
- 10 ForViva ([HOP0014](#))
- 11 Generation Rent ([HOP0018](#))
- 12 HM Treasury ([HOP0033](#))
- 13 JLL ([HOP0016](#))
- 14 Keepmoat Regeneration ([HOP0027](#))
- 15 Later Life Ambitions ([HOP0036](#))
- 16 Levitt Bernstein ([HOP0032](#))
- 17 Mr Peter Dines ([HOP0020](#))
- 18 National Housing Federation ([HOP0023](#))
- 19 National Pensioners Convention ([HOP0019](#))
- 20 NHBC ([HOP0010](#))
- 21 Northern Housing Consortium ([HOP0026](#))
- 22 Patrick Manwell ([HOP0034](#))
- 23 Peter Monk ([HOP0028](#))
- 24 Retirement Housing Group ([HOP0015](#))
- 25 Riverside ([HOP0009](#))
- 26 SAVED usap ([HOP0006](#))
- 27 Tetlow King Planning ([HOP0024](#))
- 28 The Federation of Private Residents' Associations ([HOP0022](#))
- 29 The London Carers' Centres Consortium ([HOP0001](#))
- 30 The Reeve-Wing Partnership ([HOP0021](#))
- 31 UK Finance ([HOP0030](#))
- 32 University of Westminster ([HOP0005](#))
- 33 Wirral Older People's Parliament ([HOP0003](#))



The following written evidence was received in the last Parliament by the previous Committee for this inquiry and can be viewed on the [inquiry publications page](#) of the Committee's website.

- 1 Age Friendly Manchester (AFM) ([HOP0093](#))
- 2 Age UK ([HOP0085](#))
- 3 Age-Friendly Design Group ([HOP0088](#))
- 4 Anchor ([HOP0042](#))
- 5 Anchor, Hanover and Housing & Care 21 housing associations ([HOP0050](#))
- 6 ARCO (Associated Retirement Community Operators) ([HOP0060](#))
- 7 Assura PLC ([HOP0043](#))
- 8 Audley ([HOP0018](#))
- 9 Baroness Sally Greengross ([HOP0083](#))
- 10 Barton Willmore LLP ([HOP0064](#))
- 11 Basildon Borough Council ([HOP0022](#))
- 12 Bell Phillips Architects ([HOP0071](#))
- 13 British Property Federation ([HOP0062](#))
- 14 Building Societies Association ([HOP0070](#))
- 15 Care & Repair England ([HOP0013](#))
- 16 Carers UK ([HOP0075](#))
- 17 Centre for Ageing Better ([HOP0046](#))
- 18 Churchill Retirement Living ([HOP0025](#))
- 19 CIH ([HOP0087](#))
- 20 College of Occupational Therapists Specialist Section in Housing ([HOP0032](#))
- 21 Contact Consulting (Oxford) Ltd ([HOP0015](#))
- 22 D Hamilton ([HOP0017](#))
- 23 Department for Communities and Local Government ([HOP0063](#))
- 24 Design Council ([HOP0031](#))
- 25 Dr Elizabeth Webb ([HOP0002](#))
- 26 Elders Council of Newcastle ([HOP0033](#))
- 27 Equity Release Council ([HOP0023](#))
- 28 Essex County Council ([HOP0089](#))
- 29 Foundations ([HOP0011](#))
- 30 Generation Rent ([HOP0057](#))
- 31 Grand Union Housing Group ([HOP0019](#))
- 32 Habinteg ([HOP0029](#))
- 33 Hanover Housing Association ([HOP0036](#))
- 34 Home Builders Federation ([HOP0058](#))
- 35 Horizon Senior Care Ltd ([HOP0081](#))
- 36 Hornsey Housing Trust ([HOP0090](#))

- 37 Housing & Care 21 ([HOP0076](#))
- 38 Housing Learning and Improvement Network (LIN) ([HOP0012](#))
- 39 International Longevity Centre - UK ([HOP0079](#))
- 40 JLL ([HOP0065](#))
- 41 Keepmoat ([HOP0068](#))
- 42 Kent Housing Group ([HOP0080](#))
- 43 L&Q - East Thames ([HOP0084](#))
- 44 Larkfleet Group ([HOP0040](#))
- 45 Later Life Ambitions ([HOP0049](#))
- 46 Levitt Bernstein ([HOP0014](#))
- 47 Local Government Association ([HOP0027](#))
- 48 London Fire Brigade ([HOP0055](#))
- 49 Manchester Metropolitan University ([HOP0053](#))
- 50 McCarthy and Stone ([HOP0059](#))
- 51 Melissa Fernandez & Kath Scanlon ([HOP0030](#))
- 52 Metropolitan ([HOP0037](#))
- 53 MHA ([HOP0051](#))
- 54 Midland Heart ([HOP0026](#))
- 55 Mrs Angela Cavill-Burch ([HOP0001](#))
- 56 Mrs Margaret Goodwin ([HOP0007](#))
- 57 Ms Gail Lincoln ([HOP0034](#))
- 58 NAEA Propertymark (formerly National Association of Estate Agents) ([HOP0009](#))
- 59 National Fire Chiefs Council ([HOP0021](#))
- 60 National Housing Federation ([HOP0024](#))
- 61 National Pensioners Convnetion ([HOP0008](#))
- 62 New Local Government Network ([HOP0044](#))
- 63 NHBC ([HOP0052](#))
- 64 Northumbria University ([HOP0038](#))
- 65 Nottingham City Homes ([HOP0067](#))
- 66 One Housing ([HOP0086](#))
- 67 Peabody and Family Mosaic ([HOP0082](#))
- 68 PegasusLife ([HOP0047](#))
- 69 Places for People ([HOP0041](#))
- 70 Renaissance Retirement ([HOP0054](#))
- 71 Retirement Housing Group ([HOP0039](#))
- 72 RIBA ([HOP0066](#))
- 73 RICS ([HOP0091](#))
- 74 Riverside ([HOP0048](#))

- 75 Sarah Wigglesworth Architects ([HOP0010](#))
- 76 South Hams Elders Cohousing Community ([HOP0005](#))
- 77 Southwark Council ([HOP0056](#))
- 78 Stonewater ([HOP0061](#))
- 79 Sunderland City Council ([HOP0035](#))
- 80 Tetlow King Planning ([HOP0073](#))
- 81 The Intergenerational Foundation ([HOP0074](#))
- 82 The Salvation Army ([HOP0004](#))
- 83 UK Cohousing Network ([HOP0045](#))
- 84 United for All Ages ([HOP0016](#))

## List of Reports from the Committee during the current Parliament

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All publications from the Committee are available on the [publications page](#) of the Committee's website. The reference number of the Government's response to each Report is printed in brackets after the HC printing number.

### Session 2017–19

First Report	Effectiveness of local authority overview and scrutiny committees	HC 369
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## **Accommodation Strategy**

### **Better Homes: Greater Choice**

#### **Older Persons Care Home Design Principles**

**October 2015**

The following are five key principles to consider in any care home:

1. There is increasingly a need for all care homes to be able to provide for the full range of care needs for an individual, including complex nursing care and for those living with multiple long-term conditions. The classifications of 'residential, EMI, OPMHN and nursing' for older people are becoming blurred and increasingly irrelevant as people are entering care homes much later in life than was previously the case (85 years on average in Kent) and presenting with often highly complex conditions.
2. Care homes should be able to provide short term beds as well as permanent accommodation to allow for those who can to return to community based care.
3. Purpose-built, modern accommodation will be preferred over 'guest house style' accommodation with minimum design and spacing requirements for all residents.
4. Care homes should be seen as a part of the community and as a 'hub' of activity, rather than a 'bubble' operating in isolation from the surrounding population. This will include promoting resident interaction with the community and using the potential of families and friends to engage in the life of the care home.
5. Maintaining 'active lives' within a care home by participation in the life of the home should be a key priority for any care home provider. Good design will facilitate this to become a reality.

#### **Design and spacing requirements**

All new purpose built care homes should include 'en-suite' facilities for residents. The minimum size requirements for a single room should be 12 m<sup>2</sup> (excluding en-suite facility). The layout should allow space for relatives to visit in the room and for a carer to access both sides of the bed.

The design of the accommodation, selection of equipment, signage, internal colour and finishes and landscaping should enable the independence of people who have mobility problems, may be physically frail, or who may have a visual, hearing or cognitive impairment.

Good practice states that all balconies should be a minimum of 1.6 metres in height, with no step up access to gain height at the perimeter of the balcony. Consideration

of the placing of any fixed furniture in relation to the balcony should be a part of a risk assessment for the individual resident.

Ceilings need to be strong enough to hold an overhead hoist. The layout of the room also needs to accommodate the use of a hoist e.g. a direct line from the bed to the bathroom.

Consideration should be given to the provision of wet rooms/floor level shower access.

Consideration should also be given to additional structural and weight bearing requirements within the building to accommodate bariatric residents including additional support for hoists and wider access requirements to rooms and shower facilities.

The building design should maximise natural light and lighting in communal rooms should be domestic in character, sufficiently bright and positioned to facilitate reading and other activities.

The physical environment must be “care ready” and ‘enabling’ in terms of the likely progression of impairments and long term conditions residents will experience with increasing age and frailty.

Developments should provide vibrant community facilities and encourage intergenerational activity in a secure part of the building whilst maintaining progressive privacy concepts.

The design should provide for a comfortable and homely environment that can be easily maintained and decorated. Avoidable hazards should be removed as is consistent with a domestic setting. Risk reduction should however not lead to an ‘institutional’ feel. This will be assisted by allowing residents to bring personal items of furniture and effects into the home.

Aids, hoists and assisted toilets and baths are installed which are capable of meeting the assessed needs of service users.

Access should be provided to safe outdoor environments where residents can relax or take part in outdoor activities.

Access to all areas of the home, including outdoor environments, should be fully wheelchair accessible and designed to meet the needs of all service users, including those with physical, sensory and cognitive impairments. Lift access should be provided to all floors.

Doorways into communal areas, service users’ rooms, bathing and toilet facilities and other spaces to which service users who require wheelchairs and assisted walking have access, must have a clear opening width of 800 mm.

The design should incorporate a range of comfortable and fully accessible shared spaces, including a space for receiving visitors in private, dining facilities and sitting areas.

The building should be enabled for both Telecare and Telehealth equipment both in terms of hardwiring and WiFi enabled environments to accommodate future ICT developments.

Fire and emergency evacuation should be considered in any design and comply with the requirements of Kent Fire and Rescue Service.

### **Dementia friendly design**

The majority of residents placed within care homes will be living with dementia. Therefore, it is vital to include dementia friendly design principles within any care home environment.

Building design and interior design is especially important for people with dementia. Bad design can impair memory, reasoning, learning and cause stress.

Detailed advice on dementia friendly design can be obtained from the Dementia Services Development Centre at the University of Stirling at <http://dementia.stir.ac.uk/> and the Kings Fund especially the EHE Environmental Assessment Tool at [http://www.kingsfund.org.uk/sites/files/kf/field/field\\_pdf/is-your-care-home-dementia-friendly-ehe-tool-kingsfund-mar13.pdf](http://www.kingsfund.org.uk/sites/files/kf/field/field_pdf/is-your-care-home-dementia-friendly-ehe-tool-kingsfund-mar13.pdf)

### **CQC Fundamental Standards**

All care homes will need to comply with the CQC Fundamental Standards in relation to the five key tests and specifically Regulation 12: Safe Care and Treatment.

A copy of the CQC Fundamental Standards and a full set of Regulations can be accessed at <http://www.cqc.org.uk/content/regulations-service-providers-and-managers>

# **Tisbury**

## **Parish Housing Needs Survey**

### **Survey Report**

**February 2019**



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## **1. Parish Summary**

The parish of Tisbury is in the South West Wiltshire Community Area of Wiltshire Council.

Tisbury is the largest village in the Nadder Valley and lies between the A30 and the A303. It has been a settlement for over 2000 years and is steeped in history.

There are approximately 1200 households with a population of around 2200, past surveys in the village indicate a higher percentage of people aged over 50 than the Wiltshire average.

A new housing development in the north of the parish has increased the housing stock by just under 10% and has provided 34 new social housing units managed by the Guinness Trust; 20 for rental and 14 for shared ownership.

Tisbury village has a vibrant High Street with no empty shop premises and a thriving business association; although local services no longer include a bank, a GPs' surgery, dentist and retained fire station are still present in the village.

The library and facilities for the police now form a part of the Nadder Centre, a Health and Wellbeing Centre provided as a service by Wiltshire Council. The Nadder Centre draws users to the sports facilities, meeting rooms and business centre from the surrounding villages.

A regular market complements the village shops and visitors from the smaller surrounding villages are drawn to Tisbury on such occasions.

There is no longer a secondary school in Tisbury, but the primary school is very popular.

The outdoor swimming pool is still very popular and provides recreational exercise opportunities; there are also 2 playing fields with associated equipped play areas for all ages.

A huge range of well supported clubs and groups encourage much of the community spirit that exists in the village.

Tisbury is on the main Waterloo to Exeter railway line and the commuting time into London is less than 2 hours; bus services are much less frequent and residents, especially the elderly rely on community travel schemes.

## **2. Introduction**

In Winter 2018, Wiltshire Council's Development Officers discussed carrying out a rural housing needs survey with Tisbury Parish Council and the Nadder Community Land Trust to establish if there was a proven need for affordable housing in the parish and potentially to use the findings of the survey to inform the neighbourhood plan.

Such surveys assist officers in identifying those areas with the greatest housing needs so that scarce financial resources can be put to best use.

Experience has shown that these surveys need to be carried out at regular intervals if the results are to remain relevant in identifying trends.

- The Principal Development Officers are employed by Wiltshire Council's Service Development and Enabling Team to assist in the delivery of new affordable housing.
- The Principal Development Officers work closely with rural communities, housing associations, local authorities and landowners to meet the affordable housing needs of rural communities.
- The survey is funded by members of the Wiltshire Rural Investment Partnership (WRIP).<sup>1</sup>
- The Wiltshire Rural Investment Partnership brings together representatives from the economic development, regeneration, spatial planning, service development and enabling teams of Wiltshire Council together with Registered Provider [housing association] partners and Homes England to enable and promote the sustainable delivery of new build housing in the rural communities of Wiltshire.<sup>2</sup>

### **3. Aim**

The aim of carrying out the survey is to investigate the affordable housing needs of local people (or those who need to live) in Tisbury parish.

- 'Housing need' can be defined as the need for an individual or household to obtain housing that is suitable to their circumstances.
- It implies that there are problems or limitations with the household's current housing arrangements and that the household is unable to afford or to access suitable accommodation in the private sector.
- Such problems may be concerned with housing costs, size, location, layout, state of repair, or security of tenure either immediately or in the future.

### **4. Survey Distribution and Methodology**

In order to carry out the housing needs survey, questionnaires were delivered to the Parish Council for distribution on the 22<sup>nd</sup> January 2019.

To encourage a good response, households were given a pre-paid envelope in which to return the completed survey. The council applies the data protection policy to responses, ensuring that all survey responses remain anonymous.

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<sup>1</sup> The members of WRIP that contribute to the survey funding are Wiltshire Council and six Registered Providers of social housing (housing associations) - Aster, GreenSquare, Guinness, Stonewater, Selwood Housing and White Horse Housing Association.

<sup>2</sup> Para 1.1, 'Purpose', *Terms of Reference for the Wiltshire Rural Investment Partnership*. Full WRIP membership: Wiltshire Council, Aster, White Horse Housing Association, GreenSquare, Guinness, Stonewater, Selwood Housing, Homes England, and the Wiltshire Community Land Trust.

Residents were asked to return the completed surveys in the pre-paid envelopes by 28<sup>th</sup> February 2019. The forms were recorded and analysed by the Service Development Officers at Wiltshire Council.

- A total of 1122 questionnaires were distributed to the parish.
- Everyone was asked to complete the first section of the form.
- If a household considered itself in need, or likely to be in need of affordable housing within the next five years, it was invited to complete the rest of the survey.
- There was a good response rate of 26% with 292 replies received.
- This report describes the views only of the residents who returned the questionnaires and these views may not be representative of the wider population of Tisbury.
- 2 responses were made online.

## **5. Key Findings**

This report is divided into two parts. The first section looks at existing households in the parish in order to provide a description of the current housing in Tisbury. This section also describes the levels of new housing, if any, which would be supported by respondents to the survey.

The second section examines the households who have declared a need for new housing in Tisbury. The section begins by describing the overall need for both market and affordable housing in the parish. A financial assessment is then made in order to determine the numbers of households who have a current need for new affordable housing. The results of this assessment are summarised in the recommendations of the report (Section 8).

### **Part One – Households currently living in the parish**

The first question asked on the survey was whether the respondents' home in Tisbury was their main home. 99.3% of those who replied said that it was.

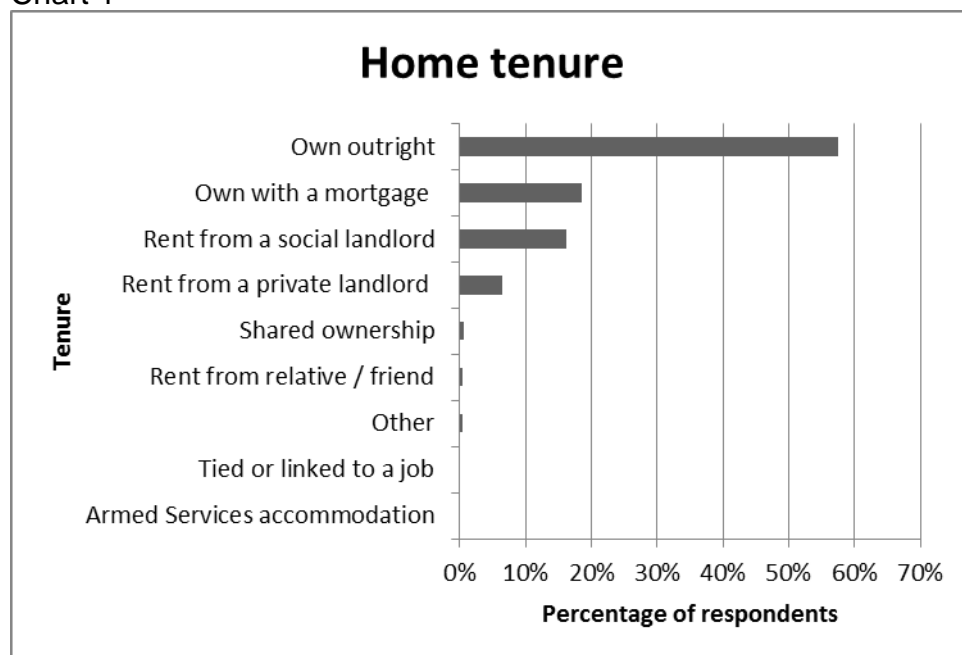
The 2011 Census data for Tisbury indicates that 58.1% of households in the parish were owner-occupying, 23.9% were renting from social landlords, 15.1% were privately renting, 1.1% were living in shared ownership (part owned, part rented) homes and 1.8% of households were living rent free.<sup>3</sup>

The chart below shows the tenure of respondents to the survey. The majority (76.0%) of respondents were owner-occupiers, while 16.1% of respondents were living in socially rented properties, 6.5% were renting from a private landlord or letting agency, 0.7% were living in shared ownership (part owned, part rented) homes, 0.3% were renting from a relative/friend, 0.3% were living in a tenure described as 'other' and none were living in accommodation tied to their employment. These results indicate a bias in the survey responses toward those living in owner-occupied homes and the rest of this section should be read with this in mind.

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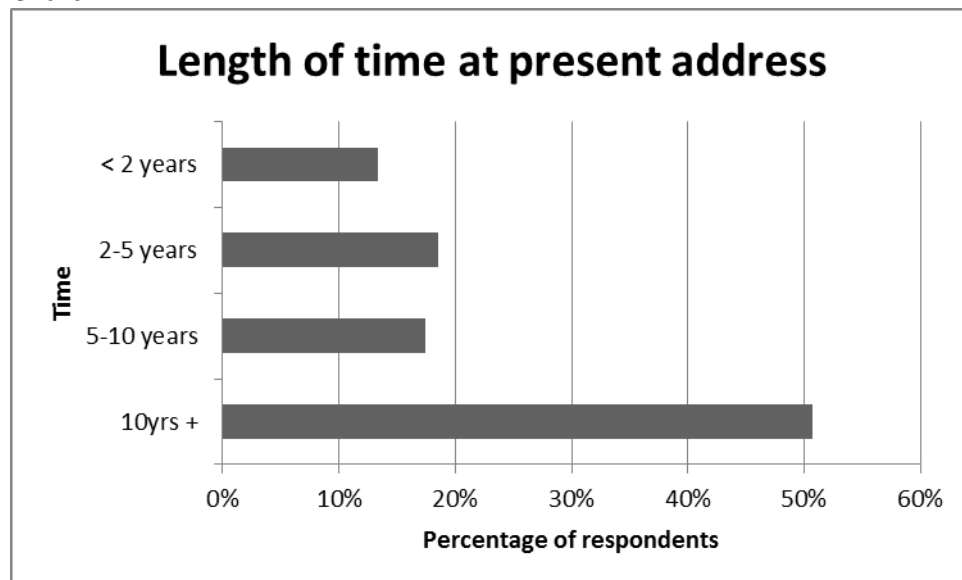
<sup>3</sup> <http://www.nomisweb.co.uk/>

Chart 1



The chart below indicates the length of time that respondents have lived in their current home. It shows that the majority of people who responded to the survey have lived in the parish for more than ten years, which is appropriate for the high levels of owner occupation among survey respondents:

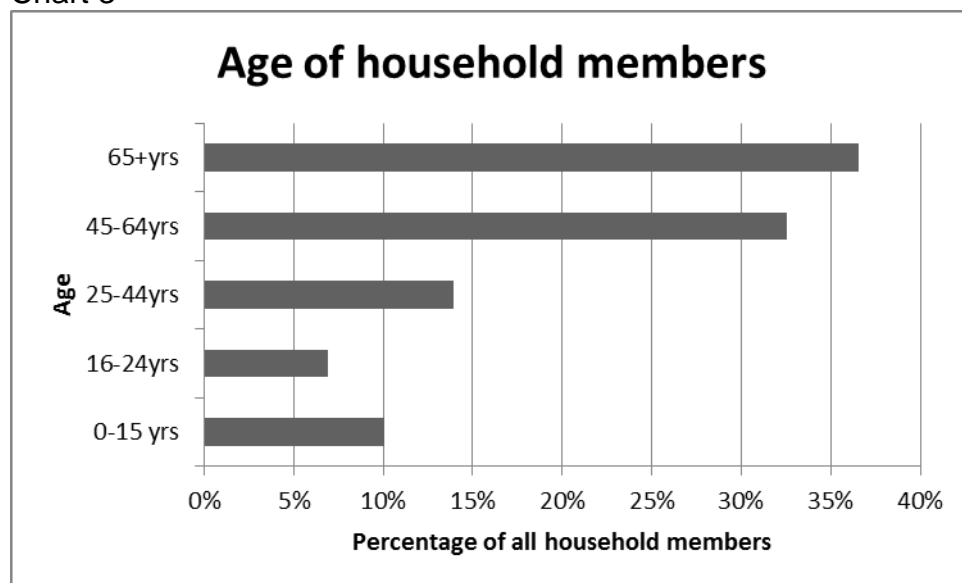
Chart 2



Many respondents to the survey lived in large family homes, with 5.8% of respondents having five or more bedrooms in their property. 23.4% lived in four bedroom homes, 40.9% had three bedrooms, 23.4% two bedrooms and 6.5% of respondents lived in homes with one bedroom.

The spread of ages recorded in the survey indicates that around a third (36.6%) of respondents' household members were aged 65+:

Chart 3



As shown in the chart above, there were significant numbers of households responding to the survey with members aged 45-64 and with children aged under 16. This indicates a spread of different household types in Tisbury, from older person households with fewer members, to younger households with children.

The distance travelled to work can also be a good measure of the sustainability of local housing development, as more people working locally can indicate an ongoing need for local housing. The table below shows how far people in the respondents' households travelled to work:

Table 1

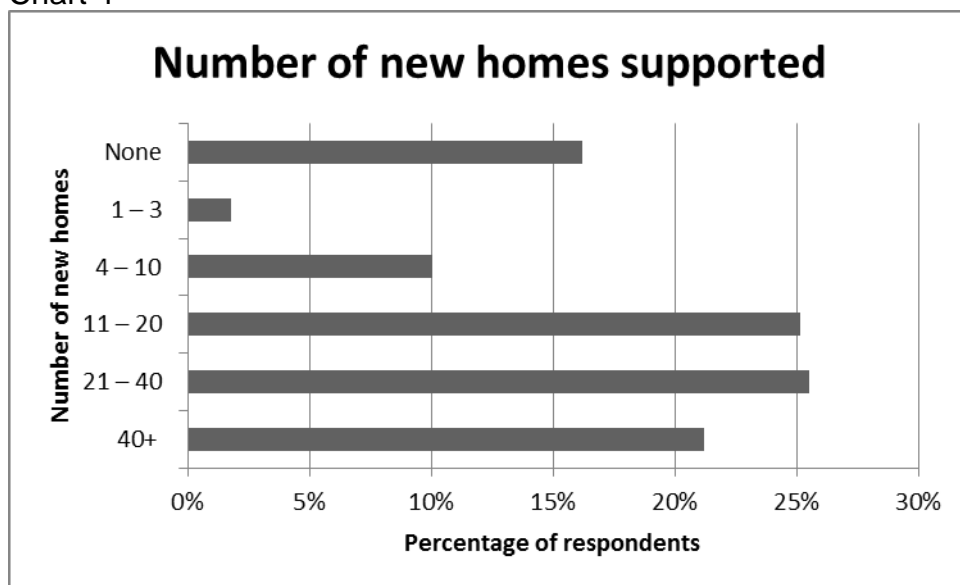
Persons in household	Distance to work				
	Up to 2 miles	2 - 10 miles	10 - 50 miles	50 miles +	Total
Person 1	27	32	58	29	146
Person 2	24	16	37	9	86
Person 3	4	4	4	0	12
Person 4	1	1	2	0	4
Person 5	0	0	0	0	0
<b>Total</b>	<b>56</b>	<b>53</b>	<b>101</b>	<b>38</b>	<b>248</b>

These results suggest a mixed level of sustainability for new housing development in Tisbury, indicated by the survey respondents' access to local sources of employment. While 44% of the households' working members usually travel less than ten miles to their place of work, 56% travel more than that, suggesting a potential lack of more local sources of employment.

Respondents were also asked whether anyone currently living in their household would need separate accommodation in the parish now or in the near future, to which 9.3% of respondents (twenty six households) answered 'yes', indicating a low level of sustained need for housing in the parish.

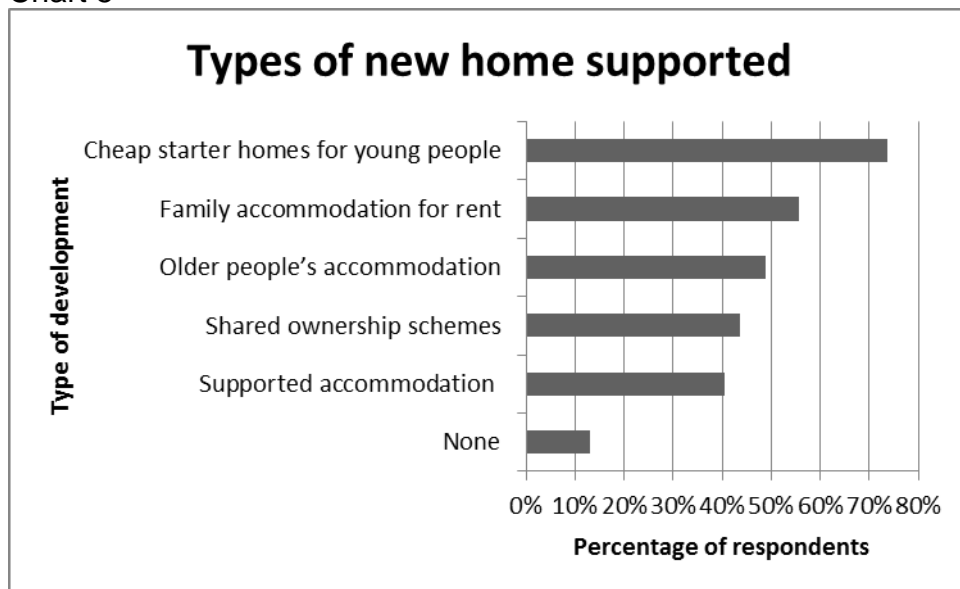
Respondents were then asked how many new homes they would support being built in the parish. A large majority of respondents (83.8%) were in support of some new housing in Tisbury, with the most popular option (25.5% of respondents) being for between twenty one and forty new homes. 16.2% of respondents were opposed to any new housing in Tisbury parish:

Chart 4



Respondents to this section were finally asked what types of housing development, if any, they would support. The types of housing considered most needed in Tisbury by the survey respondents were affordable starter homes for young people (73.8%) and family accommodation for rent (55.6%). Full results are given in the chart below (more than one answer could be given):

Chart 5



## Part two – Households requiring accommodation in the parish

This section of the report looks initially at all the responses to section two of the survey in order to give a broad picture of the need for both market and affordable housing in the parish. A financial assessment and an evaluation of the current affordable housing in Tisbury are then

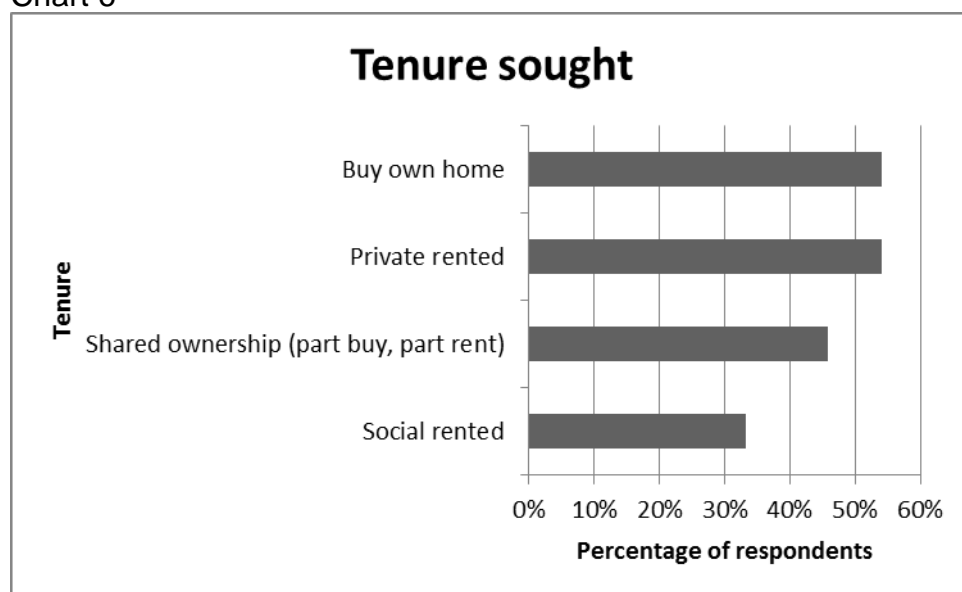


made in order to describe in more detail the need for specifically affordable (i.e. non-market) housing.

Twenty four respondents replied to this section of the survey, indicating their need for housing in Tisbury. The most frequent reasons given for needing to move were currently renting and wanting to buy (nine households), and that respondents were currently living with their families but wanted to live independently in the parish (nine households).

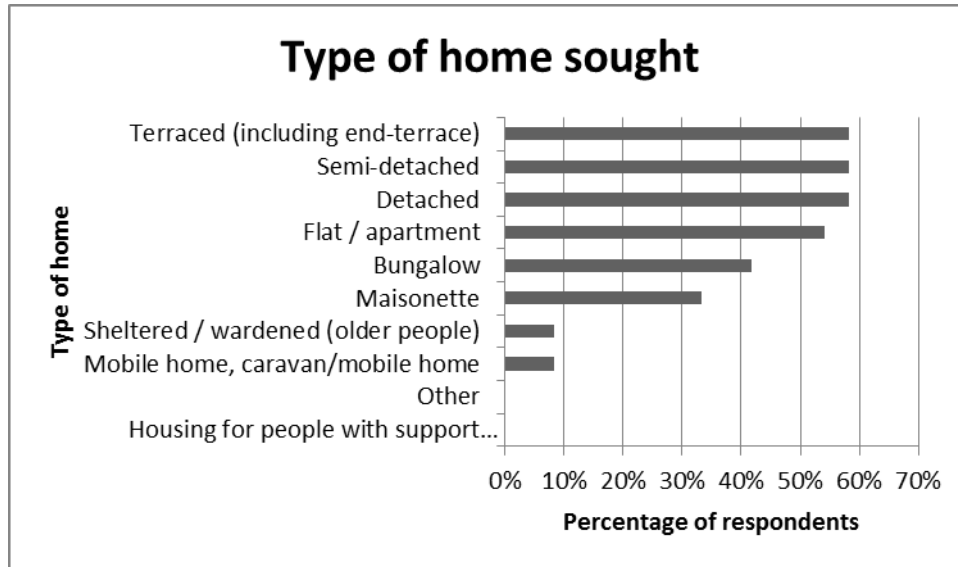
The respondents requiring accommodation in the parish were asked what type of tenure they sought. The expressed need was for all types of tenure, with socially rented homes and to buy own home the most desired. Households could indicate more than one response:

Chart 6



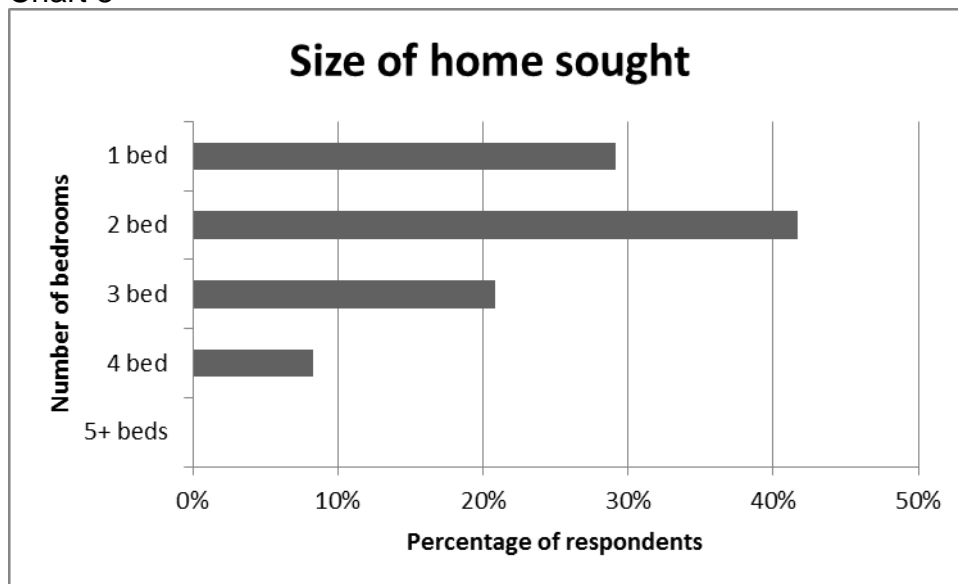
Respondents to this section were also asked what type of housing they required. The most sought-after types were detached, semi-detached and terraced properties. Full responses are given in the chart below (more than one answer could be given):

Chart 7



In terms of size, the most popular option was for two bedroom homes and respondents also expressed a need for properties with one, three and four bedrooms. No need was declared for homes with five or more bedrooms:

Chart 8



The respondents were then asked if there was a lack of suitable existing housing in Tisbury to meet their needs, to which all twenty four households answered 'yes'.

In order to assess the need for **affordable** housing in Tisbury, it is necessary to consider the equity, income and savings levels of respondents. Please note that due to the need to preserve the confidentiality of respondents, only a short summary of the financial assessment is presented below.

Only one of the households responding to this section of the survey reported having equity in an existing property. Fourteen of the twenty four households reported savings. The levels of these savings were mixed with eight of the fourteen households declaring savings of less than £10,000, four households described savings of between £10,000 and £50,000 and a further two households declared saving of more than £50,000. Income levels were varied with seven households declaring an annual income of less than £10,000pa with a further ten households reporting income of between £10,000pa and £40,000pa. Five households declared a household income of more than £40,000pa. The median gross income bracket reported by the twenty four respondents was £20,000-£21,499pa. Two households did not declare any financial information.

Comparing income, savings and equity levels with affordability in Tisbury suggests that twelve of the twenty four households would require public assistance in order to achieve their required housing and so would be considered 'in housing need' as defined in Section 3 of this report. These households inform the recommendations of this survey for new affordable housing in Tisbury, presented in Section 8.

Of the remaining households, two did not declare any financial information and one household provided data that was inconsistent, we have therefore been unable to determine the housing need for these households.

Two households expressed a desire to continue renting in the private rented sector only; these households both described a need for two bedroom private rented accommodation.

Two households currently living in privately rented accommodation expressed a desire to purchase accommodation only. On assessing levels of equity, savings and income, an open market purchase was achievable to these households. One household expressed a desire for four bedroom accommodation and the other household two bedroom accommodation.

One household currently living in a socially rented accommodation expressed a desire to move to larger accommodation. However, under the Homes4Wilts allocation policy this household would be considered adequately housed in accordance with bedroom allocation and therefore is considered to be adequately housed.

The remaining four households expressed a desire to either purchase a property or have shared ownership of a property only, however based on the income, savings and declared equity these households' aspirations were unachievable and did not meet the financial criteria for low cost home ownership.

## 6. Affordability

In order to investigate affordability, further research has been carried out on house prices in the area.

It is possible to estimate the average property prices in the Tisbury area:<sup>4</sup>

<b>Bedrooms</b>	<b>February 2019</b>
1	£202,600
2	£294,100
3	£367,000
4	£515,800
5+	£723,100

### Example calculation for a mortgage

Typically, a household making a single application can obtain a mortgage of 3.5 times their annual income, or 3x annual income for joint applications. Households would generally expect to need a deposit of around 15% of the total price.

If an average two-bedroom property sold in Tisbury cost £294,100 then a household may require £44,115 as a deposit. Annual household income would have to be at least £71,424 for a single applicant or £83,328 for joint applicants. The Annual Survey of Hours and Earnings indicates that the gross annual median income of employed persons in Wiltshire in 2018 was £28,329<sup>5</sup>

- It would be unlikely that a household would be able to purchase a property in this parish without a large deposit, some equity in an existing property or a substantial income.
- First time buyers would generally struggle to meet the criteria necessary for obtaining their own home.
- In some cases intermediate housing (shared ownership or low cost market housing) would be a suitable option, whilst in other instances affordable rented accommodation would be appropriate.

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<sup>4</sup> House price estimates from the Mouseprice local area guide to the SP3 postcode area, [www.mouseprice.com/area-guide/average-house-price/](http://www.mouseprice.com/area-guide/average-house-price/) . Please note that the SP3 postcode covers a wider area than Tisbury parish and that there may be significant internal variation in house prices.

<sup>5</sup> Annual Survey of Hours and Earnings, 2018, resident analysis. Gross annual pay of full time employed persons resident in Wiltshire, [www.nomisweb.co.uk](http://www.nomisweb.co.uk) . Note that while the mortgage calculation refers to household income, i.e. to the combined income of all persons in the home, the ASHE figure refers to individual income.

## 7. Summary

This survey's recommendations (see Section 8 below) concentrate on those households who are unable to afford accommodation on the open market.

This is just a quarter of the research needed for this assessment: the Housing Register of Wiltshire Council, the local Strategic Housing Market Assessment and the advice from allocation staff who manage the Register must also be taken into account.

- In February 2019, there were seventeen households on the Wiltshire Council Housing Register seeking affordable accommodation in Tisbury parish. Seven households seeking one bedroom accommodation, eight households seeking two bedroom accommodation and two households seeking three bedroom accommodation. It should be noted that the housing register is not static and therefore any assessment of housing need in the parish must take account of the Register as it changes.<sup>6</sup>
- The 2011 Census recorded two hundred and forty six social homes in the parish.<sup>7</sup> These properties represent 23.9% of the total housing in Tisbury, which is higher than the Wiltshire affordable housing average of 14.7%.<sup>8</sup> It should be noted here that whilst the affordable housing number is higher than the Wiltshire average, the turnover of the homes is low, see next bullet point.
- The social housing in Tisbury had an 11.4% re-let rate in the past year: from the fourth quarter of 2018 to the fourth quarter of 2019, seventeen social homes were re-let in the parish.<sup>9</sup>
- The lower level of turnover of social housing in the parish suggest that **few** of the households responding to section two of this survey and in need of affordable accommodation could meet their needs through accessing the existing social housing of the parish.

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<sup>6</sup> Wiltshire Council, Housing Strategy, live tables.

<sup>7</sup> Table QS405EW, 2011 Census: Tenure – Households, English parishes / Welsh communities.

<sup>8</sup> Table QS405EW, 2011 Census: Tenure – Households, local authorities in England and Wales.

<sup>9</sup> Wiltshire Council, Housing Strategy, live tables.

## 8. Recommendations

This survey's recommendations concentrate on households unable to afford accommodation on the open market.

The following indicates the minimum need over the next three years for new **affordable** housing development in the parish, based on the responses to the survey. The recommendations describe a snapshot of the need for affordable housing at the time the survey was conducted and do not take account of future changes in need, for example arising from the changing housing needs of employees of local businesses. The recommendations may not represent the parish's full housing need as responses were not received from every household, for example households which are on the Housing Register but have not completed a questionnaire are not included in these recommendations (see Section 7). In order to fully assess the housing need in the parish, the recommendations need to be considered alongside evidence provided by Wiltshire Council's Housing Register, the Strategic Housing Market Assessment, and the advice of allocation staff who manage the Register.

### **Subsidised rented housing <sup>10</sup>**

- 3x one bedroom homes (1x bungalow/ground floor accommodation)
- 1x two bedroom home

### **Shared ownership / discount market homes<sup>11</sup>**

- 2x one bedroom homes
- 2x two bedroom homes
- 1x three bedroom home

### **Sheltered housing for older people**

- 3x one bedroom accommodation

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<sup>10</sup> Please note that recommendations for numbers of bedrooms in subsidised rented properties are where possible made in line with the 'family size' criteria implemented as part of the Housing Benefit changes by the 2012 Welfare Reform Act.

<sup>11</sup> Please note that recommendations for numbers of bedrooms in shared ownership/discounted market properties are based on the number of bedrooms wanted by respondents, applicants can purchase the size of home they are able to afford.