

Examination of Woking Site Allocations Development Plan Document

Hearing Statement by Gillings Planning on behalf of Churchgate Services

Respondent Reference: 06762/1

Matter 2: Is the overall approach of the SADPD in general conformity with the Woking Core Strategy?

November 2019

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- 1.1 This hearing statement has been prepared on behalf of Churchgate Services and responds to Issue 2, and Q3, 6 and 9 only.

Issue 2: To what extent would the allocations, taken together, meet the requirements set out in the Core Strategy?

Q3: Policy CS13 of the Core Strategy anticipates that sites would be allocated in the SADPD to meet specialist housing needs: to what extent does the SADPA fulfil this policy requirement?

Q6: Would the SADPD allocations deliver a sufficient mix of sites to meet the assessed needs for the size, type and tenure of housing for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travelers, people who rent their homes and people wishing to commission or build their own homes)?

Q9: Is the requirement for care homes and extra care accommodation appropriately reflected in the SADPD?

- 1.2 The SADPD does not fulfil the requirement of CS13 to meet the needs of older people.

- 1.3 This is because:

- CS13 requires the need to be **met** – not ‘**contributed to**’
- Further, even if it did only require the SADPD to ‘contribute’, a single site is insufficient, and
- A general acceptance of older peoples accommodation on other allocations will not meet the assessed need either for care..

What is the need?

- 1.4 Policy CS13 is clear that the need referred to within this policy includes older people and vulnerable groups.

- 1.5 The need is then set out in the Strategic Housing Market Assessment, which is now dated as it was prepared in 2015. The SHMA estimated a need for 918 units of specialist accommodation for the elderly between 2013 and 2033. This excludes care homes, which are in addition to this figure. Our own assessment (as originally submitted) confirms this need continues to grow.

- 1.6 Clearly there is an identified need within the Borough which the Plan should seek to meet.

Requirement to ‘meet’ need

- 1.7 Planning Practice Guidance (PPG) was updated in June 2019 to address Housing for Older and Disabled People. This states that ‘the need to provide housing for older people is critical’. It requires strategic policy-making authorities to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of

older people. PPG advises that it is the decision of the plan-making body as to whether they allocate sites for specialist housing for the elderly. However, it notes that this is appropriate where there is an identified unmet need.

1.8 Policy CS13 – Older Persons and Vulnerable Groups is clear in stating

*“the Council will allocate specific sites through the Site Allocations DPD to assist in bringing suitable sites forward to **meet** need”* (emphasis added).

1.9 Contrary to the Council’s response to the representations submitted, the Core Strategy does not suggest the SADPD will ‘contribute’ to meeting this need. The policy is clear that the intention is to *meet* the need.

1.10 A review of the Core Strategy in September 2018 against the updated National Planning Policy Framework (NPPF) concluded that no modifications were required to Policy CS13 and that it accorded with Paragraph 61 of the NPPF. The review also referenced evidence concluding that there is an increasing need for specialist accommodation. There was no suggestion that the SADPD was not intended to meet the need.

Insufficient specific allocations

1.11 Despite the identified need, the Council’s own policy, the requirements of the NPPF and recommendations of PPG, only a single site allocation seeks to provide accommodation for older people as part of a mixed-use development (Broadoaks, Parvis Road, West Byfleet). Further, that policy is even not worded to ‘require’ this use.

1.12 As set out below, even if the intention were only to contribute to the need, the SADPD is insufficient in including the potential on only one specific site.

Inappropriate reliance on other residential allocations to meet need

1.13 It is accepted that accommodation for the elderly could come forward on the allocated sites. However there is no evidence to conclude that the need will be met in this way. The Council suggest that the previous level of delivery ‘*provides assurance that the market values are sufficient to ensure that schemes for older peoples accommodation continue to come forwards*’ (as suggested by the response to the representations). It is entirely inadequate and unjustified to rely on the market to meet the need without the Plan providing for such.

1.14 There is therefore no assurance that the care need will be met.

1.15 Further, the needs of older people vary significantly and as such a range of specialist forms of accommodation exist (as recognised in PPG). However, the Plan’s main strategy to address need appears to be via the encouragement of lifetime homes. Whilst this is a positive step, allowing people to remaining independent for longer, it will not meet the need for more specialist forms of accommodation e.g. extra care or care homes. By allocating sites to provide a more diverse mix of specialist accommodation for older people the efficiency of the wider housing stock will also be improved.

1.16 Further, if such allocations were relied upon to provide older persons accommodation, it is critical to note that we understand the requirements for care accommodation is not included within the Core Strategy dwelling requirement of 292 dwellings per annum. The need within the SHMA for care is in addition to this figure.

Conclusion

- 1.17 The SADPD must therefore fulfil the requirements of CS13 and allocate sufficient sites to accommodate the needs of older and vulnerable groups.
- 1.18 However, as set out, the Plan does not go far enough in seeking to meet the specialist housing needs of older people and additional sites should be given due consideration to ensure that it is sound.