

Matter 2 – Housing

2.6 The SAP currently makes no specific site allocations for particular groups of people such as specialist housing for the elderly. Is this a soundness issue?

1. The principal Core Strategy policies relating to the delivery of specialist housing are CS15 and CS26. Policy CS16: Affordable Housing is also relevant in terms of meeting identified needs.
2. Core Strategy Policy CS15 relates to the delivery of mixed and balanced communities. This states that the Council ‘will seek to ensure a genuine mix of housing types within existing and future communities’ through considering the extent to which development proposals ‘contribute to a well-integrated mix of housing types and tenures to support a range of household sizes, ages and incomes to meet identified household needs’. Policy 3.204 of the supporting text emphasises that ‘the types of housing include market, social rented, mixed tenure, lifetime homes and special needs housing for groups such as older people’.
3. Core Strategy Policy CS26 relates to supporting healthy living and the provision of health care facilities. This will be achieved through, amongst others, ‘making provision for the needs of an ageing population by promoting a range of development which supports independent living and avoiding the need for residential care’.
4. The Sites and Policies Plan Part 1 (Development Management Policies) contains the primary policies to deliver these Core Strategy objectives. Policies DM40-DM43 provide detailed guidance on the approach to meeting the needs of older and vulnerable people.
5. Policy DM40 states that the Council will support retirement accommodation and supported independent living for older and vulnerable people subject to criteria. It also requires that ‘for all residential schemes of 100 dwellings or more developers will be required to assess the need for retirement and supported independent living schemes and make appropriate provision dependent on suitability and viability’. The supporting text refers to the Strategic Housing Market Assessment as providing the evidence base for assessing need.

6. Policy DM41 relates to extensions to C2 uses including residential care homes.
7. Policy DM42: Accessible and adaptable housing and housing space standards makes provision for creating homes to support independent living over the long term. This policy requires residential developments to incorporate an appropriate proportion of dwellings that are constructed Building Regulations Category 2 standard; these homes are broadly comparable to Lifetime Homes standard and provide a high level of accessibility and adaptability which will enable people to remain in their own homes for longer.
8. The Council's position is that the existing adopted policy framework has, and will continue, to support the delivery of specialist housing and that there is an absence of any evidence base which would justify the need to make specific allocations.
9. However, where opportunities exist, specialist need housing is identified through site allocations. Two of the proposed housing allocations have been made on the basis of their extant planning consents, which are as retirement complexes: Marine View, Harbour Road Portishead, and Redwood Lodge, Failand. This is reflected in the site specific details in Schedule 1 of the plan. In addition, the proposed allocation at Nailsea Police Station has a planning application under consideration for 40 retirement units.
10. The Council has used a proportionate evidence base and identified policies to enable the delivery of the full range of housing needs over the plan period. The approach is consistent with the tests of soundness. Without robust evidence the allocation of sites for specific types of residential use could be challenged as being an inappropriate intervention in the commercial market. Recent CIL viability testing exercises showed strong viability for C3 older people's housing, meaning that providers are able to compete for sites on an equal footing.