

NOTE ON COUNTING RESIDENTIAL CARE HOME PLACES AS PART OF A HOUSING REQUIREMENT

Planning Practice Guidance (PPG) includes the following advice:

“Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement”

The full text of this paragraph is in the attached annex. However, this offers no further clarification. It is believed that the rationale for this guidance is that people moving into a care home can release a home to the market, although it should be recognised that this is by no means always the case.

In addition the section of the PPG on *“How should the needs for all types of housing be addressed?”* includes the following guidance within the paragraph on *“Housing for older people”*:

“Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2).”

The full text of this paragraph is also set out in the annex.

It is unclear whether the Government’s intention is that, as a result of this guidance, the need for places in residential institutions for older people should be included in housing requirements set out in local plans. That would be a departure from previous practice and as such, if that were the intention, it would have been expected to have been much more clearly signalled. It is not suggested in the PAS Technical Advice Note, *“Objectively Assessed Need and Housing Targets”*. Indeed, that note makes no reference to this topic.

The OAN for Stroud suggested in *“The Objectively Assessed Needs of Stroud, Forest of Dean and Cotswold”* is 11,200 homes over the period 2006-31. This figure is based on applying DCLG’s 2011-based headship rates (extrapolated) to an estimate of the household population (i.e. the population living in private dwellings) derived from the ONS’s 2012 SNPP, with various adjustments¹. It therefore takes no account of any change in the institutional population.

This means that the OAN for Stroud of 11,200 homes only includes the future need for individual private dwellings. The need for future care home bed spaces is a completely separate calculation.

¹ Calculated using 2012 SNPP to update DCLG’s 2011 based projections and making adjustments for the use of internal migration trends for 2007-12, UPC, a partial return to trend for 25-34s, and the addition of 800 homes to support economic growth.

Calculations by HDH Planning and Development Ltd for an update to the Gloucestershire SHMA suggest that Stroud will need 950 extra care home bed spaces by 2031. If in future Stroud District Council were to count bed spaces in residential homes against their housing requirement this figure would need to be added to the OAN. (This assumes that most of those in care homes would otherwise have been occupying a dwelling on their own.)

As it is by no means clear that this is what the official guidance intends, it is suggested that a better approach would be to identify separately the requirement for care home places in the local plan (as is required by the second extract from the PPG reproduced above) and to present this alongside the housing requirement. It should be made clear that the housing requirement is what the name suggests, i.e. the requirement for private dwellings.

Housing and economic land availability assessment

Paragraph: 037 Reference ID: 3-037-20140306

How should local planning authorities deal with housing for older people?

Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.

Housing and economic development needs assessments

Paragraph: 021 Reference ID: 2a-021-20140306

How should the needs for all types of housing be addressed?

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- Housing for older people
The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important.