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Winchester City Council
Planning Policy and Strategy Team
City Offices
Colebrook Street
Winchester
SO23 9LJ

Dear Sir/Madam,

**WINCHESTER CITY COUNCIL REGULATION 19 CONSULTATION PLAN
REPRESENTATIONS BY OBSIDIAN STRATEGIC ASSET MANAGEMENT LIMITED**

We act on behalf of Obsidian Strategic Asset Management Limited ('our client') and have been instructed to submit representations to the Winchester District Regulation 19 Consultation Plan. This follows previous representations submitted as part of the Winchester District Regulation 18 Consultation Plan in December 2022 and to the 'Winchester District Local Plan Strategic Issues and Priorities Consultation' in April 2021. Specifically, this representation responds to Policy H5 (Meeting Housing Needs) and seeks policy refinement to a) identify needs for specialist housing for older people; and b) subsequent allocation of sites to meet this need. This will ensure Policy H5 is effective and consistent with national policy.

In seeking these changes to Policy H5, we also provide details of our client's site at Headbourne Worthy (in the form of a Vision Document) that should be allocated as an additional housing site to meet the need for specialist 'retirement village' housing for older people, as justified below. The Vision Document is informed by a number of technical documents that are also provided. These have confirmed the site is appropriate for development. In total, the representations comprise:

- Representation Form
- Planning Statement (this letter)
- Vision Document, prepared by Pegasus Urban Design
- SPRU Briefing Note on Need for Specialist Housing for Older People
- Technical Note on Transport, prepared by Glanville
- Technical Note on Flood Risk and Drainage, prepared by Glanville
- Landscape Technical Note, prepared by Cornus Planning and Design

The Headbourne Worthy site also provides the opportunity to relocate and enhance the Cobbs Farm Shop as an important local facility whose buildings have become too deteriorated to economically refurbish. Cobbs Farm Shop is looking to ensure a seamless relocation that keeps them within the local area. The proposed development of this site offers a way to secure modern, functional premises that align with the shop's needs while keeping it accessible to the local community.

Planning Policy Context

The National Planning Policy Framework (NPPF) sets out the requirement for plan-makers to meet an identified need for housing for older people, including consideration of the type of accommodation likely to be required.

Paragraph 63 of the NPPF requires that, in the context of establishing need, the size, type and tenure of housing needed for older people (including those who require retirement housing, housing-with-care and care homes) is assessed and reflected in planning policies. This wording makes specific reference to the need to account for retirement housing, housing-with-care and care homes within planning policy.

This underpins the need to identify a greater number of later living allocations within the Local Plan to effectively deliver a greater volume of this type of development to meet increasing needs.

The National Planning Policy Guidance (NPPG) also strongly advocates the benefits and effectiveness of allocating specific sites for later living development to meet demand. NPPG Paragraph: 006 Reference ID: 63-006-20190626 notes that plan-making authorities should set out clear policies to address the housing needs of groups with particular needs such as older and disabled people. The guidance also seeks policies that provide indicative figures for the number of units of specialist housing for older people needed across the plan area throughout the plan period.

NPPG Paragraph: 013 Reference ID: 63-013-20190626 goes on to acknowledge that allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation).

Furthermore, the 'Advice on planning for the housing needs of different groups' paper from Department for Levelling Up, Housing and Communities update May 2021 is also clear that strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
- the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
- the anticipated deliverability of different forms of provision, having regard to viability.

These factors are considered, in the context of Winchester, below.

Need for Retirement Living in Winchester

Specialist Housing Needs

Winchester's Strategic Housing Market Assessment 2020 (SHMA) identifies a clear demand for improved later living provision. The SHMA report states that people aged over 65 represent 21% of Winchester District's population and numbers are expected to grow significantly. (Numbers of people aged over 65 are projected to increase by 12,400 (49%) between 2016-36 with a substantial growth of 8,700 persons aged 75+).

Linked particularly to a growing older population, the number of people with health problems and/or disabilities are also projected to increase significantly – the number of people with mobility problems is projected to rise by 3,100 over the 2016-36 period with growth around 1,400 persons with dementia.

In this context, the SHMA identifies a need for 998 homes with access to support, such as sheltered housing or retirement living, over the period to 2036. There is also a need for 620 homes with care provided (both market and affordable provision). This can be met through provision of extra care housing. Additionally, a need is shown in the SHMA for around 800 care or nursing home bedspaces to 2036.

It is not clear how the Local Plan (and Policy H5) will achieve these specific requirements.

Specialist Housing Supply

The Council's Monitoring Report (AMR) 2020 – 2021 sets out the 5 year housing land supply situation for the 5-year period from 2023-2028, and for the period 2024-2029. The AMR shows that there is currently more than 5 years' supply of housing for both the monitoring periods.

However, the housing being provided in the district is predominantly traditional market housing and not capable of meeting the acute and increasing need for specialist homes. For example, the Barton Farm Major Development is coming forward and from the reserved matters submissions, it is evident that this scheme comprises predominantly family housing and does not include provision for Sheltered or Extra Care housing. Accordingly, it is clear that there is, at present, no clear pipeline of development for the delivery of homes with which to meet later living needs specifically.

This suggests that unless Policy H5 changes to identify a specific need for specialist homes for older people, and identify specific sites for specialist housing, the need identified in the SHMA will not be met.

Our client has undertaken their own analysis of demand and supply of specialist housing for older people. The accompanying SPRU Briefing Note reinforces the SHMA conclusions that there is substantial unmet need for both sheltered housing and extra-care housing (assisted living), particularly larger schemes such as retirement villages that offer a range of services and facilities. These larger schemes are particularly important as a solution to the identified need as highlighted by the recent Government report (The Mayhew Report) on later living housing.

The Mayhew Report

The Mayhew Report identifies that the population aged 65+ is set to increase from 11.2 million today to 17.2 million by 2040. On current trends, the vast majority will live in standard housing while as many as 6.2 million will live alone, with half of them aged 80+.

The effect of this will be to pile pressure on the geographically dispersed care services and the social care system, which will struggle to find enough workers to deliver care to a widely dispersed older population.

To address this problem, the Mayhew Report *inter alia* reinforces the NPPF guidance for plan-makers to account for identified need for housing for older people within development plans, and advocates the delivery of integrated retirement communities (IRCs) as a product for best accommodating the substantial need for specialist housing for older people.

These IRC developments, typically with 60-200 units, are preferred because they tend to include 24/7 staffing and communal services and facilities. Increased size enables both a better range of amenities and greater economies of scale in providing round-the-clock care, thereby being more effective in providing optimal care and living standards and reducing the cost and complexity of care coordination in otherwise dispersed developments.

The Report promotes a bigger industry-wide building programme of IRCs - up to 50,000 new units a year. Whilst this would still not be enough by itself to stem the growth in under-occupation (which would require more than 100,000 new homes a year) it would be a big step forward.

The Emerging Local Plan Position

The draft Plan proposes only two sites to meet specialist accommodation for older people:

- Cornerways and Merrydale (SHELAA Ref KW02) Hampshire County Council owns the site and proposes to develop it for an 80 – 100 bed nursing home. (Taking account of these factors, a net gain of about 45 dwellings or dwelling equivalents is expected).
- Land adjoining the Cart & Horses PH (SHELAA site Reference: KW02) for older person's housing and open space (70 dwelling equivalents).

Neither of these sites will provide an opportunity for larger IRC development nor meet the identified need for specific sites for older people identified in the SHMA (998 homes with access to support, such as sheltered housing or retirement living, over the period to 2036).

The residual requirement for specific housing for older people is expected to be delivered through Policy H5 (Meeting housing needs) as drafted. This Policy includes a section on 'Specialist and Supported Housing' and states that proposals for well-designed specialist and supported housing (including older persons housing) *"will be supported where there is an identified need, the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided"*.

The policy goes on to state that schemes of 50 dwellings or more should include *"an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units should be provided in the same proportion as the requirements for the site as a whole"*.

The costs of developing specialist older people's housing is such that it can't compete with traditional housebuilding (because of increased build costs, management of developments and the care provision). It is extremely unlikely therefore, that the full need for specialist accommodation for older people could be met by Policy H5, which is too loose and generic to be effective in delivering this type of housing.

Policy H5 also places an expectation on the delivery via smaller ad hoc proposals alongside other residential schemes, which is less preferable and effective at meeting the requirements, than through the dedicated allocation and development of IRC living facilities, as is concluded within the Mayhew Report.

Accordingly, we do not consider that draft Policy H5 is effective or adequately demonstrates that a pipeline of specialist housing will come forward, especially in the light of the significant shortfall identified in the SHMA and the type of housing being delivered (as set out in the AMR) currently.

It follows that without the allocation of specific sites to accommodate specialist housing, the identified demand will not be met. The Draft Local Plan is not therefore in accordance with the requirements of the NPPF and cannot be considered sound in its current form.

Proposed Amendments

In the context of the above, we consider that the Local Plan (Policy H5) needs to identify a) a specific requirement for specialist housing for older people of at least 998 homes as evidenced by the SHMA (this is excluding the need for additional extra-care and care home accommodation identified); and b) identify a greater number of specialist housing sites for IRCs that can meet this demand.

To this end, **the land north west of Springvale Road, Headbourne Worthy** (as identified within the enclosed Vision Document) should be allocated for specialist retirement housing in order to assist in meeting the lack of provision for specialist housing for older people. An experienced retirement housing provider is connected to the promotion of this land and can deliver the type of development advocated by the Mayhew Report.

Moreover, the site would also allow the Council to deliver more traditional housing in the face of increasing housing needs (particularly given the recent proposed changes to the NPPF and standard methodology for calculating housing need) by freeing up existing housing resource that is being used by older people in the absence of more specialist accommodation.

Land North West of Springvale Road, Headbourne Worthy - Site Suitability

The Site has been promoted through the various SHELAA exercises associated with Winchester District Local Plan Review and has in part, been deemed to be both a deliverable and developable site within 5 years. (Site Ref: HW02).

Since 2023, discussions have been had with potential operators and a number of technical assessments have been undertaken, including a topographical survey, flood risk and drainage, highways, arboriculture, landscape visual impact, archaeological and ecological studies. This has helped to demonstrate that the site is appropriate for development.

Technical Notes on transport and flood risk accompany these representations, but in summary:

- The site lies in a sustainable location in terms of accessibility to local facilities and amenities, as well as public transport facilities.
- A new access can be provided onto Springvale Road that meets highway standards and achieves appropriate visibility splays. A secondary access for emergency vehicles can be provided from Down Farm Lane.

- The impact of development traffic on off-site junctions and roads is not considered to be significant, with the potential for an additional vehicle trip generated every 2 minutes. A further detailed assessment will be carried out in due course.
- A small part of the site along Springvale Road lies within an area of medium to high risk of fluvial and surface water flooding. However, no built development is being proposed within this area. The site is not at risk from any other sources of flooding.
- A suitable foul water drainage strategy that disposes into existing public network can be achieved.
- Infiltration drainage techniques may be feasible for the disposal of surface water in the northern areas of the site but where infiltration is not feasible, surface water run-off will be collected and attenuated in ponds before being discharged into receiving watercourses at a restricted rate. This will ensure improved drainage conditions are delivered while also providing landscape features that contribute to biodiversity and amenity.

In addition, the site provides an opportunity to relocate Cobbs Farm Shop, which is a well-established business and a key part of the local community, serving not only as a retail outlet but also as a social hub where locals gather. Cobbs want to remain in the area because they are deeply embedded in the social fabric of the area, providing a space where people can connect, shop locally, and supporting regional producers. Due to the deterioration of their current premises, Cobbs Farm Shop needs to relocate in order to continue to thrive. This adjacent site offers a way to secure modern, functional premises that align with the shop's needs while keeping it accessible to the local community.

The Vision Document sets out a concept of how the site could be developed to provide the relocation of the farm shop and provide the retirement village. The additional landscape, ecological and arboricultural work has informed a landscape-led development that seeks to contain and assimilate buildings into new areas of Green Infrastructure, (i.e. new landscape buffers including belts of native trees and enhanced hedgerows) and protect key views from the South Downs National Park (by avoiding development on upper slopes and maintaining wooded skyline). The frontage would be set back from Springvale Road with landscaping and drainage attenuation features located at the front of the Site. This reflects the character of the nursing home on the opposite side of Springvale Road, creating a degree of synergy between the two sites. The site has potential to accommodate up to 160 self contained units including 110 extra care units and 50 retirement cottages/bungalows. The development would provide its own communal facilities including 24 hour care and operator management, and incorporate a restaurant that can serve the wider community as well. It's location would have synergy with the Dower House Nursing Home opposite.

The development would provide a number of important benefits including:

- Meeting a need for specialist housing for older people in a way that reduces loneliness and isolation and providing specialist care on-site, thereby reducing the need to access other local NHS facilities, which is increasingly important given the current pressures on the NHS.
- Providing a new home for Cobbs Farm Shop which will continue to serve as an important community asset, which supports the local food supply chain and provides a facility for local people to meet and engage with others.

- Delivering circa £33.3m per annum to the local economy through construction employment and spend including circa 218 direct jobs during the construction phase.
- Delivering circa £20.5m to the local economy during operation and 155 jobs.

Summary and Conclusions

The draft Plan proposes only two sites to meet specialist accommodation for older people with an indicative combined yield of 150-170 units. This compares to the SHMA that identifies a need for 998 homes with access to support, such as sheltered housing or retirement living; 620 homes with care provided (both market and affordable provision) to be met through provision of extra care housing; and around 800 care or nursing home bedspaces in the shorter time frame to 2036.

Accordingly, in the absence of any significant degree of allocation for specialist older persons housing, we object to the current strategy as it is passive, relying on other sites providing ad hoc and uncoordinated provision. There is currently no clear pipeline of development of specialist homes, notwithstanding the acute need identified in the SHMA and our own evidence. Policy H5 therefore needs to be more specific and identify the quantum of specialist housing for older people required to be delivered; and identifying sites to deliver this requirement.

Without these changes, we consider the emerging Local Plan to not be effective in demonstrating a clear strategy or pipeline of development for the delivery of homes with which to meet later living needs and therefore unsound.

We trust that these representations will be given due consideration and would welcome the opportunity to discuss them with the Council in more detail.

In the meantime, should you require any additional information please do not hesitate to contact us directly.

Yours faithfully,

[Redacted Signature]

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Accompanying Documents

1. *Vision Document, prepared by Pegasus Urban Design*
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