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1st March 2007

REF: SE PLAN EIP

Mrs Sue Morgan  
Panel Secretary  
Bridge House  
RSS EIP Secretariat  
11  
Walnut Tree Close  
Guildford  
GU1 4GA

Dear Mrs Morgan,

**NON PARTICIPANT STATEMENT IN RESPECT OF 8Hiv & 8jiv TO BE  
CONSIDERED BY THE SE PLAN EIP PANEL**

**8Hiv & 8Jiv COMBINED THAMES BASIN HEATHS SPA**

**8Hiv/8Jiv.1 What are the implications of the Assessor's Report, and taking account of the Appropriate Assessment, on the ability of the two sub-regions to achieve the housing provision figures in draft RSS, and on any alternative growth levels and spatial options examined?**

I refer to the above topic issue which is due to be considered by the Panel. The submissions are made in respect of the Assessor's Report which will inform the Panel's discussion. My submissions on behalf of my Client McCarthy and Stone (Devs) Ltd are in respect of Section 4.5 and in particular paragraph 4.5.6 of the Report.

Yours sincerely

  
Mr Gian Bendinelli  
Principal Planning Associate

**NON PARTICIPANT STATEMENT**

**FOR 8Hiv & 8jiv**

**BY**

**THE PLANNING BUREAU LTD  
ON BEHALF OF  
McCARTHY & STONE (DEVS) LTD**

**8Hiv & 8Jiv COMBINED THAMES BASIN HEATHS SPA**

**8Hiv/8Jiv.1 What are the implications of the Assessor's Report, and taking account of the Appropriate Assessment, on the ability of the two sub-regions to achieve the housing provision figures in draft RSS, and on any alternative growth levels and spatial options examined?**

My comments are directed with regards to **Section 4.5** and in particular **Paragraph 4.5.6 of the Assessor's Report to the Panel in Respect of the TBH SPA and Natural England's Draft Delivery Plan** with regards to its implications to issues 8Hiv and 8Jiv.

With regards to **Paragraph 4.5.6**, there appears to be a fundamental misunderstanding as to what constitutes sheltered housing, and from this misconception that such occupiers would be likely to use the SPA at a similar, or potentially, greater level than the average house dweller. This assertion is incorrect for a number of reasons.

**Census Data**

Attached at **Appendix 1** is a letter from Natural England to the Thames Valley Homes Coalition and I draw to your attention Project No. 2. Natural England state in this letter that based on its research only 2-3% of visitors to the SPA lived in flats, but did not know the proportion of flats to houses or its population.

While it has not been possible to assess the make up of the housing stock within 5Km of the TBH SPA, it has been possible to determine the total housing stock and

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populations levels within the 13 Local Authorities<sup>1</sup> affected by the TBH SPA by utilising the 2001 Census.

Attached at **Appendix 2** are extracts from the 2001 Census referring to the different types of housing stock (**UV56**) and the resident population. In brief, flats/apartment made up a total of 16.67% of the housing stock and 10.24% of the total resident population.

Throughout the Assessor's Report reference is made to Natural England's visitor survey data as being reliable. If this is so, the Assessor's comments in Section 4.5 of the Report must be incorrect because otherwise one would expect residents from flats/apartments to make up at least 10% of total visitors (which based on the NE research they do not). There is in fact a significant under representation of such occupiers which supports the contention that houses and flats (general market and sheltered) should not be treated identically in respect of this issue.

Furthermore sheltered apartments must make up a small proportion of the total stock of apartments and hence the likelihood of such having material impact on the TBH SPA must also be negligible.

**The Definition of Sheltered Accommodation**

Natural England, paragraph 4.5 in their submissions to the Assessor (**TBH 23/1**) state *"retirement flats may be open to people of 50 or 55 years and over, which we believe are ages at which people will actively use the SPA"*.

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<sup>1</sup> The LPA's who made a joint submission in respect to the Assessor's Question/Topics

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Their position was supposedly clarified by a latter Natural England's letter submitted to the Assessor (TBH 23/8). However even in this letter there was still a misunderstanding as to what would constitute sheltered accommodation as is witnessed by the comments that objections would still be raised to sheltered accommodation within Zones B "*unless a sufficient level of nursing care would be provided*". In other words it would not actually constitute sheltered accommodation. Nevertheless, in respect of Zone C, Natural England indicated greater flexibility, recognising that older people would be unlikely to walk to the SPA and furthermore that the likelihood of visits to the SPA would be limited by restrictions on car parking.

Notwithstanding the above concession by Natural England, the misunderstanding stems from the assumption that sheltered housing accommodates the active elderly and thus there is no recognition of the nature and characteristics of Category II Sheltered Housing and of Extra Care Sheltered Housing.

In order to assist the panel, I attach at **Appendix 3**, an extract from **Planning For Retirement Housing – a document produced by The Planning Officers Society and the Retirement Housing Group** which refers four types of retirement housing:

- 1. Housing for the early retired, what is commonly called retirement housing;
- 2. Sheltered housing, commonly described as Category II ;
- 3. Housing for older people with higher levels of dependency (Extra Care), and
- 4. Retirement villages.

I would advise you that my client, McCarthy & Stone, are the leading providers of Category II sheltered accommodation and have constructed over 30,000 apartments nationally.

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While it may be the case that the entry age for **1 and 4** may be 50 years or over, this is not the case in respect of Category II or Extra Care Sheltered Housing, where the minimum entry age for all occupiers is 60 years and/or with a partner of 55, albeit that the instance of spouses/partners under 60 is extremely rare and always due to the ill health on the part of one of the parties necessitating sheltered accommodation. I will deal with the typical age structure of residents elsewhere in this statement.

With respect to the characteristics of Category II Sheltered Housing, I refer to the submissions made to the Assessor on my Client's behalf at **TBH 86/1** which deal with matters relating to:

- the reasons for moving to sheltered accommodation;
- typical age structure;
- car ownership levels; and
- leisure interests of residents.

The key point regarding Category II sheltered accommodation is that it is “needs-based” i.e. that people move to such accommodation when they have reached a stage in their life where they wish to act to secure their independence, for example after bereavement, illness, seeking security and companionship. The average occupancy levels in such developments are barely 1.1 persons per unit reflecting the fact that the majority of apartments are occupied by one person, usually a widow in her mid 70s.

Leisure pursuits are also largely sedentary which is why LPAs generally accept low levels of on site amenity space, accepting that the need is for the setting of developments and not for the recreational needs of residents. Similarly LPAs do not

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as a rule request contributions to open space, playing fields etc. These factors alone indicate that the allegation that such residents would be likely to use the SPA more frequently than other people is fanciful.

For the sake of completeness I attach at **Appendix 4**, chapters 1-4 of a report entitled **A Better Life by Opinion Research Business**. This independent research document, albeit funded by my Client, verifies that that moving to such accommodation is "needs based" rather than a lifestyle choice and also refers to the typical age of residents (over 70 yrs). This report lends further support to the submissions made at **TBH 86/1**.

In my Client's Category II sheltered developments, research has identified the average age of residents to be **75 years and 6 months**. In respect of Extra Care, I would again refer you to my previous comments at **TBH 86/1** which identified that the average age of entry of residents to be over **80 years of age**.

In further support to the contention that that there are clear differences between "retirement" an Category II sheltered accommodation, at **Appendix 5** I attach a letter from Natural England dated 9th January 2007 in respect of a proposed Category II development at Addlestone, Surrey.

In respect of the Addlestone site, there was no "mini delivery plan" in place. In view of his and that the fact that Natural England did not wish to abandon their "in principle position" pending the release of the Assessor's Report, there was nevertheless recognition of the specific characteristics of Category II sheltered developments compared to their base line position as reflected in their submissions to

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the Assessor. Accordingly an "avoidance strategy" was agreed with Natural England based on a minor revision to the level of car parking (a reduction from 12 to 10 spaces), a minimum entry of 65+ and the preclusions of the keeping of dogs by all residents.

Lastly and just as importantly, Natural England and the Assessor have recognised that the main reason for visiting the SPA, including the frequency of such use, is to exercise dogs. I also note that in the joint statement by 13 Councils (TBH 43/2) at paragraph 4.5 it is stated that occupiers flats were less likely to own dogs than people residing in houses. The lease agreement in all of my Client's sheltered developments precludes the keeping of dogs. Thus are likelihood of visiting the SPA must accordingly be further diminished.

In view of the above comments and previous submissions, I respectfully request that due consideration is given to the differences between retirement housing/retirement villages and Category II and Extra Care sheltered accommodation.

The assertion made by the Assessor, albeit made with the best of intentions that that occupiers of sheltered accommodation may use the SPA as much, if not more frequently, than the average house dweller is grossly misleading and based on an unsubstantiated assertion.

To quote from the Assessors Report at paragraph 4.1.35 "*...once specific thresholds are set down in guidance there is a natural tendency for those using them to stick to them...*".

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If the Assessor's comment in paragraph 4.5.6 of the Report is not amended or clarified, I foresee great difficulty in persuading Competent Authorities that Mr Burley's comments in Paragraph 4.5.6 should be set aside or given very limited weight. **I therefore respectfully request that this issue be clarified.**

Gian Bendinelli

Principal Planning Associate

The Planning Bureau Ltd

For and on behalf of McCarthy and Stone (Devs) Ltd