Ref: MSP/Proj / 027 Your Ref: Date 11th July 2017



Planning Policy
Tendring District Council
Thorpe Road
Weeley
Essex
CO16 9AJ

Dear Sir/Madam

Tendring District Council Publication Draft Local Plan Consultation - Policies LP6 and LP10

We write in order to make representations pursuant to the current consultation on the emerging Tendring District Local Plan.

Paragraph 5.10.1 of the Tendring District Local Plan – Publication Draft Final recognises that by 2033 around 60% of residents of the District will be over the age of 65. Paragraph 5.10.2 states that the Local Plan encourages the development of care, independent and assisted living homes in appropriate locations.

Notwithstanding the foregoing, Policy LP10 which follows the preceding text relates only to care homes and extra care housing. It encourages the provision of such within settlement boundaries and/or as a component of the strategic site allocations. It further suggests that new <u>care homes</u> might be appropriate outside of settlement boundaries.

The policy position is somewhat at odds with the aspiration that precedes it. Care homes and extra care housing do not represent the whole spectrum of housing need for older people. Moreover, the policy is actually restrictive of any forms of older persons housing other than care homes.

Sites allocated in a Local Plan and/or within a development boundary are likely to command a premium land value (relatively speaking). To make a residential development of an allocated site viable it is invariably necessary to work to higher densities.

However, a distinct area of housing need for older people is in the form of bungalows (age-restricted), which:

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- 1. Address a specific area of demographic need, in a District where that need is particularly pronounced;
- 2. Facilitate independent living for longer (thus reducing burdens on adult social care);
- 3. Provide opportunities for downsizing; and
- 4. Free up family housing.

Bungalow developments, though, are 'land hungry' and without exception operate at lower densities. The consequence of this is that the development of bungalows on allocated or urban sites can rarely be economically viable. Instead, such development must be delivered on lower value sites, which are generally Greenfield in nature, and located on the edge of settlements.

In recognition of this, and in order to address the overriding housing needs of the over 65's, Policy LP10 should be amended so as to be permissive of age-restricted, or mobility-restricted bungalow developments, on edge of settlement sites; where there is a proven local need.

As an alternative, Policy LP6 outlines the circumstances where residential development is acceptable outside of the defined settlement boundaries. It states that <u>council housing</u> and other forms of <u>affordable housing</u> may be permitted on sites adjoining settlement boundaries, where there is evidence of a local need which is not otherwise being met.

For the reasons outlined above, and in order to more comprehensively address the increasing housing needs of the over 65's, Policy LP6 could be amended so as to be permissive of age-restricted or mobility restricted bungalows on edge of settlement sites (where there is a proven local need) – in addition to the council housing and affordable housing that it already relates to.

We hope that this helps but should you require any additional information then please do not hesitate to contact us.

Yours faithfully,

Paul Webster

Director

