

Briefing Note for ARCO – The National Planning Practice Guidance (NPPG) and Care Accommodation for Older People

This brief note looks to explain the importance and relevance of the recently published NPPG regarding development involving specialist care accommodation for older people.

WHAT IS THE NPPG AND WHY IS IT IMPORTANT?

The NPPG sits alongside the National Planning Policy Framework (NPPF) from March 2012. At its simplest the NPPF can be said to be the strategic vision and the NPPG how you put that vision into practice. It contains all sorts of practical information such as how you should carry out housing needs assessments and what policies in development plans should and should not do.

The NPPG is in part a consolidation of circulars and advice on planning that have now been cancelled. The coalition government says it has been produced because it is committed to reforming planning to make it simpler, clearer and easier for people to use. By their estimation, some 7,000 pages of documents have been reduced down to an online resource equivalent to around 400 pages. It is only available as a webpage and there is no version that you can easily print. The thinking behind this being that the government can easily amend it when required.

The NPPG however is not purely a consolidation of what already existed. The government has put its own ideas into the document and sought to give advice on issues that were not covered as well as they might have been. Accommodation for older people would fall into that category with many organisations pointing out the lack of policy direction.

The NPPG is important because it will be used to determine planning applications and also influence the content of development plans against which such applications are primarily determined. The NPPG does say new things about housing for older people and it also says encouraging things about planning and health which will benefit those interested in care sector development.

WHAT DOES THE NPPG SAY ABOUT ACCOMMODATION FOR OLDER PEOPLE?

In the ministerial statement that accompanied the publication the Planning Minister makes reference to 13 topics he would particularly like to be noted which the government address in the document. These are big ticket items like flood risk, green belt and so on. One of these is:

“explaining how student housing, housing for older people and the re-use of empty homes can be included when assessing housing need”.

It is encouraging that a mention of older people makes it into the 13 things the Minister wants to be noted. However, accommodation for older people does not warrant one of the 41 topic headings within the NPPG. This is disappointing given the challenges that are faced.

In the part of the NPPG called *“Housing and economic development needs assessments”* there is a section on the methodology of conducting these. Needs assessment on housing are carried out by Councils to inform the housing figures in their development plans.

The NPPG has a specific section on older people’s needs. This says:

“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" (my underlining).

Later in the document in a section called Housing and Land Availability Assessment there is further reference to older people. Land availability assessments are produced by Councils and take the needs assessment forward into finding where the housing need will be met leading to allocations and policies in development plans. The reference to older people says:

"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".

These points are the main references to older people but there is an additional one that warrants particular attention. In the section "*Viability and decision taking*" it says:

"How should different development types be treated in decision-taking?"

For older people's housing, the scheme format and projected sales rates may be a factor in assessing viability".

WHAT DOES THE NPPG SAY ABOUT HEALTH?

The NPPG expands on health issues from the NPPF. The care sector can take substantial support from the NPPG for its proposed developments. The NPPG says Councils should ensure that health and wellbeing, alongside health infrastructure, are considered in local and neighbourhood plans and in decision making.

It provides a definition of a healthy community which includes that it is "*.. a good place to grow up and grow old in*" and then goes onto say that a such a community supports social interaction and also that it is "*..adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments*".

WHAT ASSISTANCE WILL THE NPPG PROVIDE TO THE CARE SECTOR?

In a section of the NPPG on design it says "*too often the needs of users, including disabled people, older people and families with small children, are considered too late in the day*". That same thing

could be said about how national and local planning policy dealt with the proposed delivery of accommodation for older people and particularly care development. You could go further and say it is common for care developments to be determined in a planning policy vacuum at local level.

The first quote above on "*Housing for older people*" is not a radical change but it refines and clarifies that Councils should properly assess the needs of older people and does add the specific requirement that in doing this they should set out the need for "*residential institutions*". The NPPF from 2012 already said that Councils should plan for a mix housing, have a clear understanding of need in their area and address that need in relation to older people. Many however still do not do as much as they should and you might only have a few sentences in the needs assessment and this can often not carry through to allocations or useful criteria based policies particularly on the modern forms of care provision such as CCRCs/villages. The NPPG will assist those of us interested in care developments to ensure Councils do more to properly assess need and have relevant policies on care development.

The second quote above on how Councils should deal with housing for older people is at face value quite radical in that such housing in the “residential institutions” C2 category should be counted against their objectively assessed housing need. There has been some excitement about what this means because Councils must have a 5 year general housing land supply and if they do not have this then, subject to other matters, sites can be released for development even when these are not allocated. C2 housing units have always sat aside from this. The excitement comes from seeing this as an incentive to Councils to deliver care villages and other C2 care development because there can be a potential contribution to the avoidance of planning appeal approvals of general housing based on the lack of a 5 year supply.

The third quote on viability, while relatively minor, is important because it will allow Councils to recognise the different costs that older people’s accommodation has compared to general housing. This will be of importance in many aspects of planning including setting Community Infrastructure Levy rates.

WHAT DIFFERENCE WILL THIS MAKE?

Our overall view is that the NPPG is helpful because it will raise the profile of older people’s accommodation. It has a good potential to ensure that new and emerging development plans spend more time looking at the care sector and include relevant policies in adopted development plans. It has the potential to be influential and helpful in individual planning applications particularly in areas with no recently adopted development plan.

These views have to be tempered because the NPPG does not stress enough the delivery of care development or how our developments have to be measured in a different way from general housing. A significant weakness of the text is that it mainly refers to assessing and providing for ‘needs’ and not overtly referencing choice, quality and meeting demand/aspirations.

Delivering specialist care accommodation is not just about meeting a simple projected need as it mainly is with standard housing. It is also about replacing many years of what we now perceive as inadequate accommodation and introducing new models of accommodation like care villages. Modern care development delivery is about innovation, evolution and rationalisation related to delivering choice and meeting demands/aspirations for higher quality solutions. The NPPG does not recognise how different we are from standard housing delivery but the third quote on viability does give the care sector ammunition to say why it is different.

There is little doubt that in terms of influencing development plans that this new policy document gives the care sector a higher profile and the ability to improve how planning policy is formed at the local level. An overall aspect of national planning policy, including the NPPG, is that decisions and research that will determine local planning policy are pushed down to the local level. The control and choice given to local Councils on what their development plan seeks to achieve and say is perhaps greater than it has ever been before. You must note that the current situation is that many Councils are still slow to appreciate the importance, benefits and practicalities across the full range of provision particularly market provision.

At the current time Councils remain weak in needs assessment, policy formulation, identifying sites and enabling delivery. The NPPG should help to rectify this but only if the housing with care sector’s voice is heard in the local development plan formulation process. There remains considerable scope for the industry to be more coherent and persuasive. It is incumbent on us all to articulate such obvious social and economic benefits as constituting fundamentally sustainable development in simple and commonly understood language.