

Local Plans
South Staffordshire Council
Community Hub
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

21 December 2022

Dear Sir/Madam

**South Staffordshire Local Plan Review – Regulation 19 Publication Plan Consultation
Representations on behalf of Completelink Limited**

Zesta Planning Ltd has been instructed by Completelink Ltd to make formal representations on the South Staffordshire Local Plan Review – Regulation 19 Publication Plan Consultation (hereafter referred to as the “Publication Plan”).

Completelink Ltd operates Prestwood House Care Home & Estate, Prestwood, Stourbridge. DY7 5AL. Prestwood House Care Home & Estate sits within a site ownership of 55 acres, encompassing a number of buildings, including Prestwood House, Boiler House, The Coach House and Prestwood Lodge as care facilities, as well as a wider complex of over-55s dwellings, known as The Oval. This is an established older people and care home site of c. 40 years, offering a range of high quality care services, within a landscaped setting.

On behalf of Completelink Ltd, we prepared detailed representations to the previous round of consultation on the South Staffordshire Council Local Plan approximately one year ago, known as the Preferred Options Consultation. These representations were submitted on 13th December 2021. For clarity, we have attached these previous representations to this submission, see **Appendix A**.

In summary, our previous representations outlined that there was a clear shortfall in the existing delivery of care bed spaces which is not being met and a future need that will not be met through proposed allocations, which have resulted from a flawed assessment of proposed allocation sites. We also introduced Prestwood House Care Home & Estate as a potential appropriate site allocation to help meet both the existing and future need.

Whilst the overall thrust of our Preferred Options representations still remains relevant, we acknowledge that the evidence base, including the future need for care accommodation and range of allocations has been updated as part of this Publication Plan consultation. We will assess this updated evidence against the key points previously raised, as follows.

Existing Need Position and Undersupply

As previously outlined in our representations to the Preferred Options Consultation (**Appendix A - Paragraphs 2.2 – 2.13**), the Council is still not meeting needs for care accommodation as outlined in the adopted Core Strategy 2012.

To recap, the explanation of Policy H5 notes that 590 extra care bed spaces were projected to be required by 2025 and that the Council's Authority Monitoring Reports established that only 204 units had been delivered since 2012. The Council's Authority Monitoring Reports have still not been updated since 2018, so it is not clear how many units have been delivered since 2018.

It is however important to note that there have only been two schemes for elderly care accommodation permitted since 1st January 2018:

- 19/00318/FUL – Sedgley Court, Kiln Way, Gospel End – 66 Units
- 20/00299/FUL – Former Gorsty Lea Garage, Wolverhampton, Codsall – 28 Units

Whilst it is not clear whether these schemes have been delivered since 2018, even if they had, they would only result in a further 94 units. This would bring the total delivery since 2012 to **298 units**. Against the total requirement of 590 units, 292 additional bed spaces would be required over the next 3 years. This equates to 97 new specialist bed spaces per year. Given that the current average (2012 – 2022) is 29 units per year, it is highly unlikely that this shortfall will be met.

This also confirms that care accommodation units are not coming forward to market within South Staffordshire, on sites that are not currently allocated. This would call into question the Council's approach to specialist housing outlined in the Publication Plan.

Importantly, there is still no discussion on whether the identified need up to 2040, also includes this significant shortfall up to 2025, which remains a clear flaw in the evidence base.

Emerging Local Plan Evidence Base, Need Position and Allocations

In relation to specialist housing/care accommodation, the key evidence base provided to support the Publication Plan is found within the South Staffordshire Housing Market Assessment Update (October 2022), the Housing and Homelessness Strategy, and the Homes for Older and Disabled People Topic Paper (November 2022).

The South Staffordshire Housing Market Assessment Update (October 2022) highlights a predicted significant increase in older people in the district over the plan period with the number of people aged 75+ set to increase by **63%** between 2018 and 2040 (up from 58.8% outlined in the evidence base for the Preferred Options). In addition, approximately 34% of the population of the district will be 60+ by 2040.

The need for specialist accommodation is set out in Table 7.2 (p. 79) of the Housing Market Assessment Update, and this indicates that **617 additional units will be required up to 2040**, as a mixture of sheltered/retirement (440 units) and extra care/supported living homes (177 units).

The requirement for 617 additional specialist units for older person households represents 6.6% of the total household growth in South Staffordshire for the period 2018 to 2040.

It should be noted that the number of units now required (617), represents an 9% increase over the number of units stated in the evidence base for the Preferred Options (568).

As well as the need for specialist housing for older people, there is also an additional requirement for Registered Care (i.e., residential care homes and nursing homes which provided a high level of care of individuals, such as dementia care). The Housing Market Update 2022 outlines that there will be a requirement for **864 additional Registered Care spaces between 2020 and 2040**, of which 52.5% should be in the affordable sector and 47.6% within a market tenure.

Homes for Older and Disabled People Topic Paper (November 2022) outlines the proposed site allocations for specialist accommodation. Although as with the Preferred Options stage, these allocations are for sheltered/retirement and extra care/supported living **only** and it is confirmed that there is no intention to allocate sites for Registered Care (Para 3.25 of the Topic Paper), instead relying on the proposed Policy HC5: Specialist Housing to bring this forward.

The level of Registered Care spaces is significant and we consider that reliance on the policy alone without allocations would not help to meet this need. As outlined above, the existing undersupply highlights that the market is simply not bringing enough development in this sector forward to meet the established needs. Allocations are vital to this in our view.

In terms of the allocations for the other specialist housing units, with the identified need of 617 units required during the plan period, it is proposed to allocate just 260 units across 6 allocation sites. This represents just 42% of the plan period requirement and the Council are expecting the majority to come forward via Policy HC5: Specialist Housing. As noted above in relation to Registered Care, the reliance on the market in this way has led to the existing shortfall in supply and is therefore flawed.

Whilst 200 of the 260 units allocated will be located on the large-scale strategic development locations, 60 will be located on much smaller sites (Cheslyn Hay/Great Wyrley (Site Ref – 536a) and Brewood (Site Ref – 079)). The indicative numbers for these smaller sites show that the specialist housing element would account for 50% of the total residential units on each site. We would also call into question whether these will ultimately be a viable proposition for the market.

All of the proposed allocations for specialist accommodation are located in the north of the District, despite the need being District-wide, further increasing the disparity in housing need distribution within the Council area.

Once again though, there has been no assessment of whether existing specialist accommodation sites within the District (such as Prestwood House Care Home & Estate) could be expanded to help meet the established needs. In this manner, emerging Policy HC5 (Specialist Housing) does not cater for the expansion of existing sites, which is a clear flaw in our view.

Prestwood House Care Home & Estate (Site - 736) was assessed up both the Housing Site Selection Topic Paper 2022 and the Strategic Housing and Economic Land Availability Assessment – November 2022 (SHELAA 2022). Principally, the Council discounted the site, primarily as it was disassociated from a settlement, but failed to consider that this is has been a thriving and sought after location for specialist accommodation for c. 40 years regardless of the location. The failure to consider the potential for existing facilities to expand has simply exacerbated the existing undersupply and increased the likelihood that future needs to 2040 will not be met in the same way.

We have highlighted why Prestwood House Care Home & Estate should be considered for expansion as part of a specialist housing allocation within Section 3.0 of our representations to the Preferred Options Consultation (Appendix A).

Conclusions

Overall, we retain objections in the way the Local Plan has been prepared in relation to specialist accommodation and are very concerned that the identified needs to 2040 will not be adequately met through the proposed allocations and policies.

In summary:

- We have identified a significant undersupply in the existing needs for specialist accommodation to 2025 totalling some 292 units.
- The proposed evidence base for the Publication Plan is silent on this undersupply, which outlines that it is not being carried forward into the emerging plan. The need in real terms is therefore significantly greater than the 617 units outlined.
- The undersupply also highlights that over the past 10 years that the market has not brought forward sufficient land for development of specialist accommodation, suggesting that allocations will be key to achieving the need targets.
- The proposed allocations for specialist accommodation within the Publication Plan only amount to 42% of the total need to 2040, which for the above reasons will be deficient, leading to greater undersupply than existing.
- All of these allocations are located in the north of the District, with none in the south, despite the needs being a District-wide requirement.
- No allocations are proposed for Registered Care whatsoever, despite the significant need outlined. Historical evidence shows that these will simply not come forward through market forces, for the reasons above.
- Further allocations will be necessary to ensure that the ever growing needs for specialist accommodation for the elderly will be met both now and in the future. As part of this, there needs to be an assessment of the existing specialist care facilities in the District and their associated capability to expand.
- Prestwood House Care Home & Estate, as a long established facility in the south of the District, provides an appropriate opportunity to expand and assist towards both the existing undersupply and future need.

We have attached a Local Plan Publication Stage Representation Form to this submission (**Appendix B**), however, to clarify, our representations relate to the following policies:

- Policy SA1 – Strategic Development Location: Land East of Bilbrook
- Policy SA2 – Strategic Development Location: Land at Cross Green
- Policy SA3 – Strategic Development Location: Land North of Linthouse Lane
- Policy SA4 – Strategic Development Location: Land North of Penkridge
- Policy SA5 – Housing Allocations
- Policy HC5 – Specialist Housing

As a result of the above, we **do not** consider that the Local Plan would meet the tests of **soundness** and may not be legally compliant. On behalf of Completelink Ltd, we would like to confirm that we would be interested in participating in a hearing session in relation to the points made above.

We trust that the above representations are clear and outline our position in relation to the Publication Plan, but please do not hesitate to contact us should you have any queries.

Yours sincerely



Rob Ellis BA (Hons) MA MRTPI
Director

Appendix A – Representations to the South Staffordshire Council Local Plan Preferred Options Consultation on behalf of Completelink Ltd (dated December 2021)

Appendix B – Local Plan Publication Stage Representation Form