

Neighbourhood Planning  
Strategic Planning Team  
South Staffordshire Council  
Wolverhampton Road  
Codsall  
Wolverhampton  
WV8 1PX

06 March 2023

Dear Sir/Madam

**Kinver Neighbourhood Development Plan – Regulation 16 Consultation  
Representations on behalf of Completelink Limited**

Zesta Planning Ltd has been instructed by Completelink Ltd to make formal representations on the Kinver Neighbourhood Development Plan – Regulation 16 Consultation (hereafter referred to as the “Neighbourhood 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.

Importantly, the Prestwood House Care Home & Estate facility lies wholly within the defined Kinver Neighbourhood Area.

On behalf of Completelink Ltd, we have also previously prepared detailed representations to recent consultations on the South Staffordshire Council Local Plan, including the Preferred Options in December 2021 and the Publication Plan in December 2022.

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 District-wide and a future need that will not be met through proposed allocations. We also introduced Prestwood House Care Home & Estate as a potential appropriate site allocation and/or capable of being considered suitable for a site-specific policy to help meet both the existing and future need.

In order to comment on the Kinver Neighbourhood Plan it is important to briefly set out the existing and emerging District-wide context in relation to the need for specialist housing/care accommodation.

### **Existing Need Position and Undersupply**

It is important to note from the outset that South Staffordshire Council is not meeting the needs for care accommodation which were established in the South Staffordshire Council Core Strategy (December 2012).

The explanation of Core Strategy 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 1<sup>st</sup> 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 lack of delivery 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 South Staffordshire Publication Plan.

Importantly, South Staffordshire has not outlined whether their identified need up to 2040, considered within the Publication Plan, also includes this significant shortfall up to 2025 mentioned above. In our view, this highlights the opportunity for additional allocations or site-specific policies to be included at both District-wide and Neighbourhood Plan level.

### **Emerging Local Plan Evidence Base, Need Position and Allocations**

In relation to specialist housing/care accommodation, the key evidence base provided to support the South Staffordshire 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 District-wide 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 in 2021 (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. **Further allocations and/or site-specific policies 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 as a result there will be a requirement to provide further allocations or site-specific policies. These are capable of being provided through the Neighbourhood Plan as discussed later in this submission.

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. Again, this highlights the potential and opportunity for additional allocations and/or site-specific policies within the Neighbourhood Plan.

Prestwood House Care Home & Estate (Site - 736) was assessed in 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.

### **Kinver Housing Needs – Specialist Accommodation**

The Kinver Housing Needs Assessment (HNA), dated December 2021 and prepared by AECOM, is a key supporting document under the evidence base for the Neighbourhood Plan. This document outlines the Kinver Neighbourhood Area needs for specialist housing for older people.

As at District-wide level, it is outlined that the population of older people (aged 75+) in the Kinver Neighbourhood Area is estimated to grow to 1,571 in 2038 from 1,127 in 2019. It is acknowledged that there would be, *“knock on effect on the demand and need for specialist accommodation to meet the needs of some of these people for care and support in later life”* (Section 6 Paragraph 30 of the HNA).

The Kinver Neighbourhood Development Plan Regulation 16 Version (December 2022) main document (Page 23) notes that:

*“A need for more accommodation with specialist and flexible care provision was also identified by the HNA, partly due to our ageing population. **Kinver has a high population of older residents compared to the local and national average, and it is rising. The care homes in the area do not provide sufficient quantity or flexibility of care to meet expected need.**”*

The HNA has calculated that the future need in Kinver is up to **141 additional specialist accommodation units**. Considering that the District-wide requirement is 617 additional units up to 2040, the requirement for Kinver is a very significant proportion (23%) of the entire South Staffordshire area. This again demonstrates the high proportion of older people in comparison to the rest of the District.

This also further serves to highlight the existing approach to specialist accommodation allocations within the emerging South Staffordshire Publication Plan, being located wholly within the north of the District. It is clear that there is a significant and growing need in the southern part of the District, in particular in Kinver Neighbourhood Area.

The HNA concludes that:

**38. It is considered that Kinver is, in broad terms, a suitable location for specialist accommodation on the basis of the accessibility criteria and the considerations of cost-effectiveness above. As such, there is potential for such accommodation to be provided within the Neighbourhood Plan area** (while noting there is no specific requirement or obligation to do so if there is potential to meet need arising from Kinver in other suitable locations near to but outside the Plan area boundaries). Where it is considered for any reason desirable to meet some of the specialist need outside the Neighbourhood Plan area boundaries, there will be a degree of overlap between the number of specialist dwellings to be provided and the overall dwellings target for the Neighbourhood Plan area itself.

**40. Wherever specialist housing is to be accommodated, partnership working with specialist developers is recommended, so as to introduce a greater degree of choice into the housing options for older people who wish to move in later life.**

There is a clear identified need at both District-wide and at Kinver Neighbourhood Area level that needs to be addressed within the plan period, whether that be to 2038 or 2040 (to line up with the South Staffordshire Publication Plan).

The need in Kinver is a significant proportion of the whole district-wide area, yet there are no intended allocations proposed within the South Staffordshire Publication Plan for the southern half of the District and none are proposed to date in the Kinver Neighbourhood Development Plan version subject of this consultation. As we have outlined above, development proposals for such schemes are simply not coming forward to market on unallocated sites, which has led to the current undersupply. Allocations remain vital to ensure the identified needs are met, especially given the Green Belt constraints in Kinver.

As a long-established specialist elderly care facility providing a range of accommodation types within the Kinver Neighbourhood Area, Prestwood House Care Home & Estate should be considered for expansion through the Neighbourhood Plan, either through specific reference within the proposed policies or as a standalone allocation.

### **Kinver Neighbourhood Development Plan Policy**

As outlined above, despite the identified needs for specialist accommodation in Kinver, there are no specific allocations for such accommodation within the Kinver Neighbourhood Development Plan Regulation 16 Version (December 2022).

In addition, and in part due to the Green Belt planning policy constraint covering the majority of the Neighbourhood Area, the proposed policy wording could be amended or could go further to supporting the provision of additional specialist accommodation in the area. To this end, we would comment on the following proposed policies:

- Policy KN01: Economy
- Policy KN02: Housing
- Policy KN12: Transport

#### **Policy KN01: Economy**

This policy focusses on village centre uses, small business (Use Class E), tourism, agricultural diversification and homeworking. There is no mention of retaining and expanding existing employments sites or acknowledging the benefits to the economy in other sectors, including care provision.

Prestwood House Care Home & Estate is not only a thriving community with residents reliant on local facilities but is a significant employer locally within the Kinver Neighbourhood Area. As we have outlined, there is opportunity to expand the specialist accommodation on site, which would in turn lead to further employment opportunities.

We would request that this policy makes reference to the protection and expansion of other employment generating uses within Kinver Neighbourhood Area, including large employers like the Prestwood House Care Home & Estate. It could also make reference to our suggested specific policy referencing Prestwood House Care Home & Estate, as developed care site in the Green Belt. This will be discussed further below.

The interpretation to this policy states that, *“The policy would not support inappropriate development in the Green Belt”*. We would suggest that it is unnecessary to state this, given that there are already Green Belt protections under the NPPF and the existing/emerging South Staffordshire Council Development Plan policies.

#### Policy KN02: Housing

We acknowledge that Policy KN02: Housing supports the provision of specialist accommodation in the Kinver Neighbourhood Area (Point 3) however it does not outline where and how this will come forward to meet the significant needs outlined in the Kinver Housing Needs Assessment (HNA).

In addition, the interpretation to this policy states that, *“Where development of brownfield sites or infill development is proposed in the Green Belt, it would clearly be subject to meeting national and Local Plan requirements for Green Belts”*. As with our point above, we would again suggest that it is unnecessary to state this and given the following, the approach to certain Green Belt development, particularly in relation to previously developed sites, needs to be reconsidered.

As we have outlined in our discussions above, the market is not bringing forward specialist accommodation development in South Staffordshire on unallocated sites, hence the current undersupply. As a result, limiting the provision of housing development only to the options outlined in Policy KN02 1 (a-e) **will not** meet the identified needs for specialist accommodation within Kinver Neighbourhood Area. As with the District-wide position, it is quite clear that specific allocations and/or support for the expansion of existing facilities (whether in Green Belt or not) will need to be considered as part of the Neighbourhood Plan. This will be discussed further below.

#### Policy KN12: Transport

We acknowledge the broad thrust of this policy and are supportive of the general principles, but we would request that there is some acknowledgement that the expansion of existing specialist care accommodation can be acceptable, where they are located outside of defined settlement boundaries.

Specialist accommodation and care facilities tend to have fewer vehicular movements due to the nature and age of the occupiers. In addition, they also have certain day to day facilities on site. Prestwood House Care Home & Estate represents one such facility.



## Potential New Green Belt/Site Specific Policy

In order to meet the identified needs for specialist accommodation and care facilities within Kinver Neighbourhood Area, it is clear that there will need to be some form of allocation or site specific policy to bring the necessary development forward.

Whilst the Neighbourhood Plan process is not capable of Green Belt releases per se, it is entirely possible for site allocations and/or site specific policies to be included within the Plan in order to meet identified needs. Sequentially, the expansion of existing sites, previously developed land and brownfield land (whether in the Green Belt or not) should be the starting point for any allocation or site specific policy.

As discussed, Prestwood House Care Home & Estate is a long-established facility for specialist accommodation and care on an expansive site totalling 55 acres. There are numerous buildings on the site and a significant opportunity to expand. There is already an established community there, with on-site essential facilities, which is sustainable in its own right.

As a result, we would request that consideration is given to including a site-specific policy for Prestwood House Care Home & Estate, not only to recognise its importance for the local economy, but also to acknowledge its potential to expand to provide additional specialist/care accommodation. This would acknowledge the Green Belt location, but also give the opportunity to develop the site sustainably and allow for the ability to demonstrate Very Special Circumstances.

This policy could either be inserted into Policy KN01 (Economy) and KN02 (Housing), or it could be standalone.

A similar site specific policy approach was adopted by Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council in their Joint Core Strategy (JCS) (Adopted December 2017) <https://www.jointcorestrategy.org/adopted-joint-core-strategy>

Policy SD5 (Green Belt) of the JCS provided site-specific policies for Gloucestershire Airport, Cheltenham Racecourse and waste management sites, owing to their economic importance, ability to meet various needs and acknowledging their potential to expand, owing to their location in the Green Belt. Without the provision of this policy wording, this would have restricted development on these key sites or importance. We have attached the wording of this policy (which is also available at the link above) to this submission for clarity (**Appendix A**).

It is our view that Prestwood House Care Home & Estate could be considered suitable for a site-specific policy in the same manner to recognise its economic importance to the local area and to allow for the potential to expand the facility to help meet the identified needs for specialist accommodation the in Kinver Neighbourhood Area.

## **Conclusions**

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

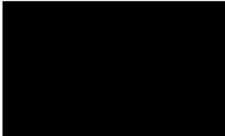
In summary:

- 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 South Staffordshire 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.
- All of the South Staffordshire Publication Plan allocations are located in the north of the District, with none in the south, despite the needs being a District-wide requirement.
- The Kinver Housing Needs Assessment (HNA) outlines a local need for 141 additional specialist accommodation units up to 2038. This amounts to 23% of the District-wide total. Despite this, no allocations or site-specific policies are proposed at this stage to address the needs of Kinver in either the Publication Plan or the Neighbourhood Plan.
- Further allocations or site-specific policies 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 within Kinver Neighbourhood Area, provides an appropriate opportunity to expand and assist towards both the existing undersupply and future need. We would therefore recommend that a site-specific policy is introduced to the Neighbourhood Plan to recognise this sites importance to the local economy and its ability to expand to help meet the established needs, despite its location within the Green Belt.

- Suggested amendments to Policies KN01, KN02 & KN12 have also been outlined above to ensure consistency with this approach.

We trust that the above representations are clear and outline our position in relation to the Kinver Neighbourhood 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 – Policy SD5 (Green Belt) of the Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council in their Joint Core Strategy (JCS)**