



## **Consultation Response**

### **Draft Development Plans Manual (Edition 3)**

#### **Welsh Government**

**August 2019**

### **Introduction**

Age Cymru is the leading charity working to improve the lives of all older people in Wales. We believe older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

We are pleased to respond to the Welsh Government's consultation 'Draft Development Plans Manual (Edition 3)'. The number of older people in Wales is growing and we are, on average, expected to live longer. 2016-based national population projections for Wales indicate that the number people aged 65 and over is projected to increase by 232,000 (36.6 per cent) between 2016 and 2041.<sup>1</sup> This is a cause for celebration and a major achievement for our society. It provides us with opportunities for the future, but also challenges and it will require changes to the way in which we plan and deliver public services. The fact that older people make up an increasing section of the population makes it ever more vital that future planning reflects their needs. We believe that planning for, and responding to, demographic change should be a key consideration in the preparation of development plans, and that planning decisions should take into account how they will affect people across different stages of the life course of future generations.

### **Comments**

We would like to make the following comments in relation to the preparation of development plans:

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<sup>1</sup> Welsh Government (2017) National population projections: 2016-based. 26 October 2017.  
<https://gov.wales/national-population-projections-2016-based>

## Placemaking

Being able to take part in community life, with good access to local services and facilities, is a lifeline for many older people. If an older person cannot get out and about locally they are at risk of poor health, less social contact with others and a reduced quality of life overall.

With reference to placemaking, we would highlight the importance of accessible and inclusive design. The features that make a place desirable to live in can change as people get older. It is essential that the built environment in communities is designed and adapted in an age friendly way so that it is sustainable and suitable for people of all ages. Increasing opportunities for older people to take part locally can do much to boost independence, combat social isolation and loneliness and promote health and wellbeing.

All outdoor environments and public spaces across Wales should be accessible, inclusive and usable for all older people. Safe and accessible streets, places to meet to socialise that are easily accessible by public and community transport, and adequate public seating, street lighting and public toilets in our communities all help to facilitate this.

An age friendly community is one that has the capacity to support older people to enjoy the best possible quality of life. It includes facilities, services and amenities that are accessible and that accommodate the needs of older people to help them enjoy health and wellbeing and to fully participate in society.

With reference to rural areas, a report by the Older People's Commissioner for Wales<sup>2</sup> highlights that the need for effective rural connectivity has been heightened by the closure of local banks, shops and other services, meaning older people have to travel further to access these services and other vital amenities. Lower levels of car ownership and car use amongst older people can also lead to them becoming marginalised and unable to access community services in rural areas, leading to significant impacts on their wellbeing.<sup>3</sup> We would highlight the importance for development plans to take into account the impacts on people living in rural areas in Wales, especially with reference to accessing services and public and community transport.

## Planning for housing

The housing needs of people may change as they get older, so it is essential that older people have access to a range of good quality housing options and services that meet

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<sup>2</sup> Older People's Commissioner for Wales. The Importance and Impact of Community Services within Wales.

[http://www.olderpeoplewales.com/Libraries/Uploads/The\\_Importance\\_and\\_Impact\\_of\\_Community\\_Services\\_within\\_Wales.sflb.ashx](http://www.olderpeoplewales.com/Libraries/Uploads/The_Importance_and_Impact_of_Community_Services_within_Wales.sflb.ashx)

<sup>3</sup> Shergold et al. (2011) cited in: Older People's Commissioner for Wales. The Importance and Impact of Community Services within Wales.

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their needs. People must be able to live safe, independent and active lives in the setting most appropriate to them. Specialist retirement housing, including sheltered accommodation and extra-care housing, can offer basic support for many older people allowing them to live independently for longer within a safe and secure environment. We believe that development plans should look to ensure that all forms of retirement housing are built within age friendly communities, to ensure that residents have full access to local services, facilities and public transport to support independence and wellbeing.

Accessible housing is vital to people being able to live independently for longer. We want to see all new homes in Wales built to Lifetime Home Standards,<sup>4</sup> making them suitable for people of all ages, and which will be easier and less costly to adapt if people's needs change.

The Welsh Government established an Expert Group on Housing an Ageing Population in Wales, and the Group's report addresses 5 key themes including a planning system which reflects the needs of our ageing population.<sup>5</sup>

### Community facilities

Communities in Wales must meet the needs of all generations and ensure that people of all ages can access the services and facilities they need. An age friendly community is one that has the capacity to support older people to enjoy the best possible quality of life. It includes facilities, services and amenities that are accessible and that accommodate the needs of older people to help them enjoy health and wellbeing and to fully participate in society.

A vital aspect of creating an age-friendly Wales is to enable older people to play an active role in society. It is important that older people have opportunities to participate in their local community through social activities, learning and volunteering. Efforts must be made to reduce some of the barriers that can lead to isolation such as a lack of local services and amenities, and to increase opportunities for older people to participate in their communities.

### Transport

Transport is a crucial factor in determining older people's ability to access vital amenities. Without appropriate services and infrastructure older people can become isolated from their community and society, unable to access essential services, participate in activities or visit friends and family.<sup>6</sup> Reliable and accessible local public and community transport networks become increasingly significant as people get older. 48% of pensioner households do not have access to a car compared to 26% of all

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<sup>4</sup> Lifetime Homes <http://www.lifetimehomes.org.uk/>

<sup>5</sup> Welsh Government (2017) Our Housing AGenda: meeting the aspirations of older people in Wales. A report by the Expert Group on Housing an Ageing Population in Wales. January 2017.

<sup>6</sup> Older People's Commissioner for Wales. The Importance and Impact of Community Services within Wales.

[http://www.olderpeoplewales.com/Libraries/Uploads/The\\_Importance\\_and\\_Impact\\_of\\_Community\\_Services\\_within\\_Wales.sflb.ashx](http://www.olderpeoplewales.com/Libraries/Uploads/The_Importance_and_Impact_of_Community_Services_within_Wales.sflb.ashx)

households,<sup>7</sup> and many older people rely on bus services to get out and about.<sup>8</sup> Community transport schemes provide an essential lifeline for many older people, especially in rural areas. We believe that planning proposals should ensure the development of a fully integrated sustainable transport network in Wales, with trains and buses linked to other forms of transport including community transport, pedestrian and cycle routes, and better integration between transport and key services.

Accessing public transport can present significant physical problems for many older people. For older people with limited mobility, getting to the bus stop is a significant issue which is compounded by a lack of facilities at bus stops. More bus stops and shelters with seating would make public transport more accessible. Accessibility problems at railway stations include stairs to platforms and a lack of lifts. Older people who can and want to use trains require reliable rail travel supported by adequate infrastructure, including seating and accessible toilet facilities in stations.<sup>9</sup>

#### Public consultation of development plans

In order for communities to adequately serve older people, their views and experiences must be considered during the public consultation process for development plans. It is vitally important that public consultations are accessible and inclusive for all members of the public.

As more information and consultations are made available mainly or exclusively online, there are real risks of excluding those older people who are unable to access online services. Planners must ensure that consultation documents are accessible and available in various formats, and that the provision of online information is not to the detriment of the provision of information in other formats. Online services need to be high quality and easy to use, whilst offline services should be of equal quality and fully accessible.

We hope these comments are useful and would be happy to provide further information if required.

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<sup>7</sup> Welsh Government (2015) National Transport Plan 2015 – Draft. Equality Impact Assessment – Part 1 and Part 2.

<sup>8</sup> Age Cymru (2013) Buses – a lifeline for older people. Older people's experience of bus services in Wales. A report by the Bevan Foundation for Age Cymru. <https://www.ageuk.org.uk/cymru/our-impact/policy-publications/buses-a-lifeline-for-older-people/>

<sup>9</sup> Older People's Commissioner for Wales. The Importance and Impact of Community Services within Wales.

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