



Hart Local Plan: Strategy and Sites 2016 – 2032

Hearing Statement

Matter 5 – Housing: the supply of land for
housing, deliverability and viability

Representations

on behalf of

Crookham Care Village Ltd (ID: 170)

October 2018 | AM-P Ref: 18019



Inspector's Questions

1.0 Introduction

- 1.1 AM-P are instructed by Crookham Care Village Ltd to submit this Hearing Statement to the Examination on the Hart Local Plan 2016 - 2032. Previous submissions on behalf of our clients have been made throughout the emerging Local Plan process, in respect of Land at Cross Farm, Crookham Village.
- 1.2 This Hearing Statement is concerned with Matter 5 and is based on previous submissions and representations made on behalf of our clients and specifically addresses questions 5.1 and 5.2 raised by the Inspector in the Matters Issues and Questions document.

2.0 **Q 5.1 – Are the projected commitments in the Housing Trajectory based on a realistic and robust assessment of the likely timing of delivery?**

- 2.1 The projected delivery rates are highly unrealistic in relation to specialist accommodation for older people. We consider that the proposed Housing Trajectory fails to make adequate commitments for housing for older people, let alone basing delivery on a realistic and robust assessment.
- 2.2 Having reviewed the Council's trajectory and the sites which the Council rely on, there is only one site which will meet the needs of older people and two others that could potentially be earmarked as making provision. Site Land South of Blackwater River and east of Sandhurst Road (14/01903/MAJOR) is currently 'under construction' and will provide 45 units in a 'continuing care retirement community'. The other two sites are Hartland Village and Edenbrook (extension), Hitches Lane (13/02513/MAJOR). As set out in our responses to Q5.2 and Matter 4, we do not think that Harland Village will provide any housing for older people. With regards to Edenbrook (extension), it is noted on page 12 of the Council's Five Year Housing Land Supply – 1st April 2018 (Ref: HOU4) that this the 50 'extra care flats' envisaged at this site was excluded from the Reserved Matters application granted in 1/7/15. The Outline application for the wider Edenbrook site was permissioned in 12/09/14 and a review of the Decision Notice states that applications for approvals of Reserved Matters shall be made within a period of three years from permission date. Three years from the Outline permission date is 12/09/17. The date has now clearly passed. No further applications have been made to secure this element of the scheme. Given this, we consider that this site will



not provide any housing for older people in the Plan period. It is noted that any suggested provision at Murrell Green/Winchfield will come outside of the Plan period and has yet to be secured. Therefore, the total supply of specialist housing which has confirmed to be 'deliverable in the Plan period is only 45 units.

- 2.3 Even on the basis of the figures in the SHMA (which we dispute – see response to Matter 8 – Q 8.9) which sets out that 129 units per year (1, 935 units over the Plan period) need to be provided in the District to meet the needs of older people, we do not see any link in the Council's housing supply/housing trajectory which demonstrates how this challenging requirement will be met. The current secured provision of 50 units is wholly inadequate.
- 2.4 In accordance with the NPPF (2012) the definition of deliverable is as follows:
- “Deliverable: To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”
- 2.5 Focusing purely on the deliverability of specialist housing sites, there is no evidence to support the claims of the Council that appropriate levels of housing for older people will be delivered and/or in a timely manner over the Plan period.
- 2.6 As we make clear in our Hearing Statement related to Matter 8, there is currently an undersupply of housing for older people in the District and a significant immediate requirement over the Plan period. We consider that a minimum 232 units per year are required up to 2025 (approx. 3,480 over the Plan period). It is our view that provision for older people is required immediately in order for the Council to address this key issue. Hartland Village and Edenbrook (extension) site will fail to do this and without any further identified sites, the Council's proposed Housing Trajectory fails to set out the timely delivery for housing for older people.
- 2.7 The lack of delivery of housing for older people undermines the Council's strategy as set out in policy H4. This will have significant adverse consequences for meeting the housing requirements for older people over the Plan period. The lack of identified



housing to meet the needs of older people and its timely delivery demonstrates that the Local Plan is ineffective and therefore 'unsound'.

2.8 The Cross Farm site is suitable for a 160-unit care village with a 64 four bed care home (C2). Proposals at the site would include a continuing care retirement community, with a mixture of cottages, apartments and a care home both capable of delivering on-site domiciliary care packages to village occupants and the surrounding area. A care village is a community which is designed and built in a 'future proofed' fashion to allow residents to remain in one place with their community but being able to call on care services and facilities as they need them to match their personal requirements. Only residents around retirement age and with a need to take a care package are allowed to occupy the care village. This is not open market housing. Occupation will be by 'cascade selling' mechanism which favours local residents first. Proposed development would include a dedicated space for its own medical centre and visiting doctors. There would be a resident nurse provided on site. Proposals would include additional facilities on site such as hydro pool, fitness suite and community centre. These will be made available to existing local residents and will restore services and amenities to Crookham Village which have been lost over the years. Re-allocation of Cross Farm will:

- a) It will respond to the accommodation needs and aspirations of the substantially increasing number of older people in the area;
- b) Through proven design and facilities and with the benefit of the knowledge gained in successfully delivering provision over 30+ years, it will provide an environment in which quality of life will be enhanced, independence maintained and the conditions and risks characteristic of advanced old age will be mitigated;
- c) It will offer a robust pattern of provision to maintain its care and support for the resident population as individuals age and exhibit increased levels of need;
- d) It will assist in the renewal of the housing stock designed to meet the needs of older people and in addressing the tenure imbalance found in the current pattern of provision;
- e) It will mitigate the increasing pressure upon public health services and social care services in the area;



- f) It will offer an attractive option to those older home-owners who may be considering moving to smaller and more easily managed accommodation, freeing up under-occupied family accommodation to more appropriate occupation, thus mitigating the demand for new-build housing; and
- g) It will help deliver the policy aspirations of Hampshire County Council, its health partners and Hart District Council in responding appropriately to the levels of need they have identified, and which are substantiated in this report.

2.9 Given the above, we consider that Cross Farm should be re-allocated to secure the effectiveness of the Local Plan. This matter is of strategic importance and runs to the heart of the ‘soundness’ of the Plan. Re-allocation of Cross Farm would be positive and proactive step demonstrating the Council’s clear commitment to addressing this issue. It will also ensure the proposed housing trajectory is robust. Cross Farm can be considered ‘deliverable’ site and can therefore be included in the first five years of the Local Plan period. This will ensure the timely delivery of housing for older people and contribute to meeting the immediate and significant need over the Plan period.

3.0 Q 5.2 – Is the anticipated delivery from Hartland Village for each year in the Plan period realistic?

3.1 The anticipated delivery of housing for older people at Hartland Village in the Plan period is unrealistic.

3.2 The related approved planning application 17/0047/OUT at Hartland Village is a hybrid application for a housing led scheme consisting of (Outline) 1,500 dwellings (C3) and (Full) 181 dwellings (C3). The full application is effectively phase 1 of the scheme.

3.3 We note that the planning application was approved on 13th July 2018, subject to condition (see appendix 1 of our Hearing Statement on Matter 4). The description of development does not include any mention of ‘older people’ housing (e.g. no C2) and there is no condition(s) attached to secure it. A review of the submitted Planning Statement makes no mention of the provision of housing for older people forming part of the proposals.

3.4 We have also reviewed the S106 (see appendix 2 of our Hearing Statement on Matter 4) related to this application (signed 6th July 18). Again, no clause has been included



which secures housing for older people: 1) on site or; 2) provision off site or; 3) a financial contribution towards the provision elsewhere within the District.

- 3.5 The planning permission was secured and S106 was signed post consultation and submission of the Hart Local Plan (consultation 9th Feb 18 – 26th March 18 and submission 18th June 18), therefore in full knowledge of the policy requirements of H2 and H4.
- 3.6 We are not aware of the Council and/or the applicant having prepared anything further retrospectively post publication/submission of the Local Plan which indicates housing for older people will be secure at Hartland Village.
- 3.7 Whilst we consider that the above facts mean that no provision for older people will be secured on the site, we note the anticipated delivery timetable for housing at Hartland Village. Housing for older people will not be included in the first phase of the scheme (i.e. the 181 units secure by the Full application) and therefore even if an element is included in phase 2 (highly unlikely) this will not be delivered until Nov 2022 at the earliest. As we make clear in our Hearing Statement related to Matter 8, there is currently an undersupply of housing for older people in the District and a significant requirement over the Plan period. It is our view that provision for older people is required immediately in order for the Council to address this key issue.
- 3.8 Given the above, we consider that Cross Farm should be re-allocated to secure the effectiveness of the Local Plan. This would be a positive and proactive step demonstrating the Council's clear commitment to addressing this issue. It will also ensure the proposed housing trajectory is robust. Cross Farm can be considered 'deliverable' site and can therefore be included in the first five years of the Local Plan. This will ensure the timely delivery of housing for older people and contribute to meeting the immediate and significant need over the Plan period.