

## **Representation on behalf of Mr Michael Lodge, land owner**

### **In respect of the provision of Specialist Housing for Older and Vulnerable People**

#### 1.0 Introduction.

- 1.1 This paper augments the representation submitted by Mr Graham Fisher of gplanning Ltd. in respect of Hillside Nursery, Ware Road, Hailey (postal address Ware Road, Hoddesdon SG13 7NZ) recorded as Comment ID2368 against policy DPS3 Housing Supply. Although not stated the representation was submitted on behalf of the land owner, Mr Michael Lodge. Mr Lodge has owned the site for at least the last 10 years. It relates to the provision of specialist housing.
- 1.2 Mr Fisher's representation seeks to promote release of this previously developed approximately 1.88ha site (accorded the SLAA ref of 37/004) from the Metropolitan Green Belt and its redevelopment to provide
- A 24 bed dementia care unit and
  - 30 units of mixed tenure two storey affordable housing.
- 1.3 Mr Fisher drew attention at his paragraph 6.20 to the need identified in paragraph 14.8.6 of The Pre Submission District Plan for a gross increase of at least 530 bed spaces of C2 provision, primarily to help meet the accommodation needs of older people to live in an environment which provides residential and/or nursing care.
- 1.4 This paper responds to question 8 listed under the Inspector's heading of "Matter 2 – The Development Strategy – Housing" with specific reference to spatial distribution/supply of housing for older and vulnerable people.

#### 2.0 Additional Representation.

- 2.1 The supporting text set out in paragraph 3.2.6 of the Pre Submission Plan draws attention to the fact that *"The housing need figure for the District does not include the projected increase in the number of people within residential institutions"*. The paragraph continues by explaining that the (2015) SHMA identifies the projected growth in the District's population aged 75 or over living in communal establishments in the District at 529 persons during the Plan period of 2011 to 2033. Having reviewed the 2015 SHMA it is assumed that the figure of 529 was derived by apportioning the total figure identified for the SHMA of 1,773 persons over the 22 year period (see paragraph 6.20 of the 2015 SHMA) to East Hertfordshire. The figure of 1,773 is stated to be based on the CLG assumption that there will be a greater level of population aged 75 (and over) in residential care homes. Paragraph 3.2.6 of the Plan then explains that *"In addition to the overall housing target, this Plan supports a gross increase of approximately 530 bed spaces of C2 provision, primarily to help meet the accommodation needs of older people who need to live in an environment which provides residential or nursing care"*.

- 2.2 Section 14.8 of the Plan looks in detail at Housing for Older and Vulnerable People and at paragraph 14.8.5 repeats the fact that the OAN for the District does not include the projected increase of the institutional population. Paragraph 14.8.6 then confirms support for an increase in bed spaces for C2 provision, albeit changing the qualification applied to the number of 530 from “*approximately*” to “*at least*”.
- 2.3 This figure of 529/530 was based on household projections which were already acknowledged to be out of date. An updated SHMA was issued in July 2017. Whilst this has increased the FOAN from 16,390 to 18,396 units over the Plan period, a revised figure for the District’s population aged 75 and over does not appear to have been provided. Hence, **evidence suggests that the Plan has not adequately addressed this important element of housing need in terms of the level of provision required.**
- 2.4 There is also serious concern that inadequate attention has been given to where these bed spaces are to be provided. Part I of policy HOU6 sets out criteria against which proposals will be judged and Part II puts into policy the Council’s support for a gross increase of at least 530 bed spaces to help meet the accommodation needs of those who need specialist (Use Class C2) residential and/or nursing care. However, it does not appear that any serious attention has been given to the deliverability of the required bed spaces.
- 2.5 Having reviewed the chapters of the Plan which relate to existing settlements, it would appear that some provision is anticipated from Bishop’s Stortford North pursuant to clause (c) of Part V of policy BISH3, and from Bishop’s Stortford South pursuant to clause (c) of Part III of policy BISH5. However there is no indication of the quantum of provision required. There is no policy requirement for specialist housing under policy HOU6 within the Sawbridgeworth chapter. This leads to the conclusion that all of the bed spaces required to serve the eastern half of the District (a figure presumably equivalent to approximately half of the minimum total requirement or at least 265 bed spaces) will be met within Bishop’s Stortford. The likelihood of this being achievable should be addressed in the Council’s evidence and, if it is concluded that this identified level of need is not certain to be met, specific site allocations should be made.
- 2.6 The situation is arguably more severe in the western half of the District given that there is no requirement for specialist housing under policy HOU6 to be provided at any of the allocated housing sites serving Hertford, namely HERT2 Mead Lane Area, HERT3 West of Hertford, HERT4 North of Hertford or HERT5 South of Hertford. Policy WARE2 Land North and East of Ware does include a requirement at clause (d) of Part V for a care home/flexi care or sheltered properties but, as with the Bishop’s Stortford policies, no indication of the scale of provision required is stated. However development on this site is not envisaged as commencing before

2022. Hence, there is a total lack of provision for the western part of the District for the first 5 year period of the Plan and arguably inadequate provision for the entire Plan period.

2.7 Moreover, it would not be reasonable to expect the Ware site alone to meet the identified need for at least 265 bed spaces (assuming an approximately equal apportionment of the total minimum requirement of 530 spaces) between the east and west of the District.

2.8 Thus, this also leads to the conclusion that **evidence suggests that the Plan has not adequately addressed this important element of housing need in terms of the delivery of the level of provision required.**

2.9 Land owned by St Cross Developments Ltd., being located proximate to the primary road network and on a main bus route which connects all of the main settlements in the Lee Valley (Hertford, Ware, Hoddesdon, Cheshunt and Waltham Cross) is ideally located to help meet this need in the western part of the District. It should therefore be accorded a designation for Specialist and Affordable Housing in the District Plan.

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