

Homes England

Hearing Statements for Harborough Local Plan 2011 - 2031

Matter 4

Prepared by WYG Environment Planning Transport
Limited

September 2018

Preamble

- 1.1 WYG are instructed by Homes England, formerly Homes and Communities Agency, ('our client' hereafter) to provide planning consultancy advice in respect of their land interests at land at Stretton Hall Farm, Great Glen ('the Site' hereafter), which lies within the boundary of the District of Harborough Council.
- 1.2 Detailed comments have been made to the Proposed Submission stage of the Harborough Local Plan 2011 to 2031.
- 1.3 WYG have been representing the client since May 2018. Prior to WYG's involvement, representations were submitted to the emerging Harborough Local Plan on behalf of our client by Amec Foster Wheeler. Amec Foster Wheeler and WYG have prepared a complete suite of environmental and geotechnical studies/assessments of the Site.
- 1.4 Since the previous representations were submitted in December 2017, the Homes and Communities Agency has been rebranded as Homes England and given a stronger focus on the delivery of homes by the Government. This enhanced role includes the ability to acquire land and assemble sites where it assists in bringing forward strategic sites for new homes. Based on this new role, Homes England has acquired an option on a further 17 hectares of land fronting London Road to assist in the delivery of a strategic access to the A6.
- 1.5 Our client's land interest extends to 113 hectares of land at Stretton Hall Farm which lies adjacent to the border with Oadby and Wigston Borough Council and the Leicester Principle Urban Area (PUA). The majority of our client's land interest is shown edged in red on drawing A090070-456-001. The Site comprises land in agricultural use and bounded to the west by existing residential uses on the edge of Oadby and the south east by the Leicester Grammar School campus. Existing residential development, built in the 1990s on the site of the former Stretton Hall hospital, is located to the north-east of the site.
- 1.6 The Site is available and suitable for delivering new homes, for all sectors of society, during the Harborough Local Plan 2011-2031 period. Our client is not seeking to promote their entire land interest in the Harborough Local Plan but up to 500 homes and an extra-care facility on the southern part of the Site (see drawing no A090070-456-001) in tandem with the development of a nationally important sporting hub linked to the existing high-quality sporting facilities at Leicester Grammar School.
- 1.7 The representation submitted to the Proposed Submission draft of the Harborough Local Plan on behalf of our client identified a potential unmet need for new housing during the Plan period both within the District of Harborough and the adjacent Leicester PUA. In addition to its role as landowner our client is also an important housing delivery partner in the District of Harborough and with a Government remit to deliver a significant level of new homes in England in this Parliament.

- 1.8 If this unmet need is confirmed the land at Stretton Hall Farm offers the opportunity to deliver new homes and important sporting infrastructure in the next 1-5years.
- 1.9 This Hearing Statement seeks to reiterate and update where necessary, comments previously made in respect of the Proposed Submission stage of the Harborough Local Plan 2011 to 2031 to confirm our Client's position. The Statement relates to Matter 4 from the Inspector's Matters and Issues for Examination dated 15th August 2018.

Matter 4: Homes to meet the needs of all the community

Inspector's Question 4.1: *"Are the plan's policies sound and effective in delivering a wide variety of quality homes to provide for the needs of all the community? Relevant issues are:*

- *The plans proposals in respect of a mix of sizes and types of home including family homes and homes for older people;*
- *The delivery of affordable homes;*
- *The provision of accessible homes;*
- *The provision of specialist accommodation;*
- *The provision of student accommodation;*
- *Sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople;*
- *Houses in multiple occupation;*
- *Self-build and custom homes;*
- *Rural exception sites;*

- 2.1 Homes England is the Government agency tasked with accelerating housing delivery in England, both open market and social/affordable, within the current Parliament i.e. up to June 2022. Homes England's role in the delivery of sites includes site acquisition and site promotion together with assistance with overall funding and construction via its delivery partners. Our client is therefore uniquely placed to ensure that new homes are delivered in the public interest but also meet the needs of all the community.
- 2.2 Our Client wishes to make comments specifically on the first bullet points in Question 4.1.

The plans proposals in respect of a mix of sizes and types of home including family homes and homes for older people

Delivery of affordable homes

- 2.3 Homes England welcomes the aspirations of Policy H2 to seek the delivery of high level of affordable homes in the District of Harborough. The District has a high affordability ratio and relatively high land values which historically had limited the delivery of affordable homes.
- 2.4 Notwithstanding the above, Homes England is keen to ensure that the full spectrum of affordable and specialist housing need is delivered in the District and the provisions of Policy H2 does not undermine, in viability terms, the delivery of important accommodation for the elderly.
- 2.5 Policy H4 in the Harborough Local Plan 2011 to 2031 Submission Draft relates to specialist housing, namely sheltered and extra care accommodation. Whilst the inclusion of Policy H4 in the local plan, as a dedicated policy on specialist housing, is welcomed by Homes England the proposed criteria and the absence of any allocated sites and the reliance on open market housing sites to deliver specific accommodation for the elderly represents a missed opportunity and therefore the Local Plan is unsound in its current form.
- 2.6 In 2012, the Adults and Communities Department's Strategic Planning and Commissioning team at Leicestershire County Council prepared a report which explored where in the County future Extra Care housing schemes would be best developed. The work took into consideration the demographics of older people in Leicestershire and the need for them to access other services such as transport, health and community involvement. As a result of the needs mapping, ten key geographical areas were identified as ideal areas for the development of Extra Care this included:
- "Area located to the north and northwest of Market Harborough [Harborough district]"*.
- 2.7 Although the mapping exercise has not been updated since 2012, the previous research indicates that the Great Glen area of Market Harborough represents an area of unmet need for such accommodation.
- 2.8 The County Council is currently updating their local needs analysis for older people and updated details are expected in Autumn 2018.

Current Situation and Need – Market Harborough

- 2.9 The Evidence Base for the Harborough Local Plan 2011-2031 includes the Housing and Economic Needs Assessment (HEDNA) prepared for the Leicester and Leicestershire Authorities and the Leicestershire and Leicestershire LEP. The report was prepared by GL Hearn and was published in January 2017. The study is an important part of the evidence base for Local Plans and the Strategic Growth Plan being prepared jointly by the City, County, Borough and District Councils and the Leicester and Leicestershire Enterprise Partnership (LLEP).
- 2.10 Chapter 9 of the HEDNA deals specifically with the need of specific groups including 'Older Persons Housing Need'. The reports states that "*in Leicester and Leicestershire, as in many areas, a growing older person population is likely to have some impact on the future need and demand for homes*". The report identifies a potential need for 9,119 units of specialist housing for older people (365 per annum) in the 2011-31 period.
- 2.11 The report confirms that the categories of specialist housing for older people are defined as:
- Sheltered housing: Schemes/properties are included where some form of scheme manager (warden) service is provided on site on a regular basis but where no registered personal care is provided. A regularly visiting scheme manager service may qualify as long as s/he is available to all residents when on site. An on-call-only service does not qualify a scheme to be included in sheltered statistics. In most cases schemes will also include traditional shared facilities - a residents' lounge and possibly laundry and garden.
 - Enhanced sheltered housing. Schemes/properties are included where service provision is higher than for sheltered housing but below extra care level. Typically, there may be 24/7 staffing cover, at least one daily meal will be provided and there may be additional shared facilities.
 - Extra care housing: Schemes/properties are included where care (registered personal care) is available on site 24/7.
- 2.12 HEDNA estimates that there are approximately 6,700 units of specialist accommodation across the Housing Market Area. This is equivalent to 92 units per 1,000 people aged 75 and over. The analysis shows a significantly higher proportion of the stock is in the affordable than the market sector (76% vs. 24%). This figure is not split per Local Authority area.

- 2.13 The HEDNA estimates the need for specialist housing for older people by using a toolkit that has been developed by Housing Learning and Information Network (LIN), in association with the Elderly Accommodation Council and endorsed by the Department of Health. The toolkit identifies potential demand for different types of specialist housing for older people and model future range of housing and care provision. The toolkit assumes that the correct ratio is approximately 170 units of specialised accommodation (other than registered care home places) per thousand people aged over 75 years.
- 2.14 Table 65 of the HEDNA Report shows the change in the population aged 75 and over for the period 2011-2031 and what this would mean in terms of provision at 170 units per 1,000 population. This equates to 1,267 units in Market Harborough District during the Local Plan period or 51 units per annum.
- 2.15 The work undertaken by GL Hearn also included an analysis of the current profile (type and tenure) of older person households in the HMA and confirmed that the current tenure split is significantly biased towards outright ownership, with the current supply having a notably higher proportion of affordable homes.
- 2.16 On this basis, the report concludes "*that additional specialist housing should be split roughly 50:50 between the market and affordable sectors*" (Para 9.15). However, the report goes on to state, at paragraph 9.16, that "*decisions about mix should be taken at a local level taking account of specific needs and the current supply of different types of units available (for example noting that at present the dominant type of housing is traditional sheltered accommodation)*".
- 2.17 The Council acknowledges in the explanation to Policy H4 that the call for sites process did not identify potential sites for specialist housing. Based on the findings of the HEDNA Report and, particularly, the need to bring forward specialist accommodation from the affordable housing sectors, the Council should have actively engaged with social housing providers specialist in the provision of elderly care facilities in order to identify available public land, including land in Homes England's ownership, where such facilities could be brought forward early in the local plan period.
- 2.18 The explanation to Policy H4 identifies the need for circa 1000 specialist accommodation units to come forward during the local plan period. No information is provided by the Council to confirm the level of specialist accommodation that has been brought forward during the plan period to date. Equally there is no commitment in the Plan to monitor future approvals in order to measure the delivery of such accommodation in line with this policy. This approach is unsound and differs from the Council's approach to open market and affordable housing.

- 2.19 Policy H4, as drafted, seeks to deliver specialist accommodation within existing residential area or as part of large scale residential development (sites over 100 dwellings) only. The criteria in this Policy is too restrictive and does not allow for purpose-built accommodation to come forward in other potentially suitable locations, i.e. edge of settlements or on sustainable access routes, as standalone extra-care facilities or linked with compatible uses.
- 2.20 In addition, any available windfall sites within existing residential areas will be competing with open-market housing and are unlikely to exceed 100 dwellings. On this basis, providers of specialist accommodation will find it hard to secure sites that accord with the Policy and thus reducing the likelihood of such facilities being delivered.
- 2.21 The Site at Stretton Hall Farm is within our client's ownership and thus there is no immediate impediment, notwithstanding the need for planning approval, for the delivery of up to 100 units of sheltered or extra care accommodation within 2-3 years of the adoption of the local plan. Further specialist accommodation could be brought forward in tandem with open market residential units on the wider land holding, linked to a subsequent allocation in the adoption of the local plan. The delivery of these units will contribute to meet the District's existing need for specialist housing for elderly people.

