



MATTER 10

SPECIALIST HOUSING AND RESIDENTIAL ALLOCATION
BRAINTREE SECTION 2 LOCAL PLAN EXAMINATION



Hearing Statement of Lewis & Scott Retirement Living Ltd

June 2021

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1 INTRODUCTION

- 1.1 This statement has been prepared in response to the proposed allocation of the land at Mount Hill, Halstead – Policy LPP 25. It is prepared on behalf of Lewis & Scott Retirement Living Ltd following the submission of representations by Mark Jackson Planning on behalf of the landowner, Mrs Pauline Hennessey.
- 1.2 This Hearing Statement addresses the published 'Matters, Issues and Questions', specifically the question posed within Matter 10 – A Prosperous District – Homes – Specialist Housing and Residential Allocation (Policy LPP25 – Specialist Housing – Mount Hill, Halstead).
- 1.3 It is significant that outline planning permission was granted on 30 April 2020 for the development of the site (ref. 16/01646) to include a total of 16 no. supported living homes and 9 no. market homes falling within Use Class C3 of the Town & Country Planning (Use Classes) Order. The planning permission remains extant and capable of implementation following the approval of reserved matters and discharge of any conditions or obligations. As such, the principle of development at the site has been secured through the planning application process.
- 1.4 Furthermore, the grant of planning permission clearly demonstrates that there are no technical constraints to the delivery of the site and the principle of the development of the site for specialist housing is acceptable when assessed against the policies of the NPPF.
- 1.5 Notwithstanding the established planning position at the site, it is important that the relevant policies of the Local Plan are consistent and guide the development of the site for specialist housing. In doing so, they must ensure that they are not inappropriately restrictive and contain sufficient flexibility to deliver housing that meets the needs of an ageing population.
- 1.6 As a consequence, this Hearing Statement provides further evidence in response to the MIQs and carries forward the arguments made in representations to date.
- 1.7 Specifically, it:
 - Confirms the extent of the need for specialist housing, specifically that to meet the needs of an ageing population in Braintree;
 - Seeks the inclusion of the site within the development boundary of Halstead in order to meet the defined need for specialist housing; and

- Seeks the widening of the policy wording to reflect the evidenced need for specialist housing for older people.

2 POLICY LPP25 SPECIALIST HOUSING – MOUNT HILL, HALSTEAD

Q1. Are the above policies and site allocations justified by appropriate available evidence, having regard to national guidance, and local context, including the meeting the requirements of the BLP Section 1?

Q3. Do policies LPP 25 and LPP 32 provide clear direction as to how a decision maker should react to a development proposal in relation to these allocations

2.1 The decision to grant outline planning permission for the development of the land at Mount Hill, Halstead was taken within the context of the available evidence, national planning policies and the Development Plan. As such it is self-evident that the allocation of the site for specialist housing is also compliant with the evidence, policies and plans.

2.2 Indeed, it is significant that there is strong evidence of need for housing within the specialist housing sector, particularly in relation to Districts ageing population. This is contained within the Strategic Housing Market Assessment (SHMA), Update 2015 and expanded upon with up-to-date evidence from 2.4. The matter is considered in detail in Section 6 of the SHMA, which confirms, inter alia, that:

- The Housing Market Area (HMA) contains a higher proportion of 'older person only' households to the regional and national figures [para 6.3];
- The population aged 65 or over is going to increase dramatically (a rise of 52.9%) over the plan period [para 6.5];
- Given the dramatic growth in the older population and the higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward [para 6.8]; and
- Table 6.2 and paragraph 6.11 identify the extent of potential future needs for specialist housing over the plan period.

2.3 However, it is important to note that this evidence is now dated and there are concerns with the approach identified within the evidence to the extent of need. The approach to projecting future needs for specialist housing that is based on current occupation patterns and a limited definition (sheltered and extra care housing) is illogical in the context of the dramatic growth of this sector of the population. As such, any decision to base an assessment of needs on the lower of the two potential figures, as is the case with

paragraph 6.11, risks dramatically under assessing the extent of the need, which could result in significant health and wellbeing impacts as people are unable to find suitable accommodation.

- 2.4 Therefore, a common baseline needs to be established. The 2015 SHMA indicates the population aged 65+ to increase from 134,682 in 2015 to 205,906 in 2037, a rise of 52.9%. Using the Projecting Older People Population Information System (POPPI) as per the SHMA, the current figure of people aged 65+ in 2020 was 144,700 in the HMA, a rise of 6.92% from 2015. By 2040 this figure rises to 196,000, an increase of 35.45%, or 51,300 people. In Braintree, this equates to 43,100 by 2040, a 36.39% increase from 2020.
- 2.5 Whilst the above shows a slight decline in the overall number of people aged 65+, the overall health of this demographic is set to decline, as the number of people with a limiting long-term illness whose day-to-day activities are limited a lot has risen to 44,774 by 2040, representing 22.84% of the population, an increase of 1,949 from the SHMA. In Braintree, this equates to 9,465 by 2040, a 48.80% increase from 2020 and represents 21.96% of the total population.
- 2.6 Expanding upon the point above, it is prudent to note the increase in specific health conditions by 2040 when framing the need for specialist housing for older people aged 65+ (this list is not exhaustive):
 - 2.6.1 38,701 people are predicted to be living with mobility issues – 8,571 living within the Braintree District – a 48.82% increase from 2020
 - 2.6.2 53,985 people are predicted to suffer a fall – 11,897 living within the Braintree District – a 41.44% increase from 2020
 - 2.6.3 15,742 people are predicted to have dementia – 3,513 living within the Braintree District – a 59.24% increase from 2020
 - 2.6.4 16,827 people are predicted to have depression – 3,693 living within the Braintree District – a 35.47% increase from 2020
- 2.7 Given the above, it is therefore critical to ensure the modern needs, demands and long-term independence is supported through the right type of specialist housing. The representations to the draft Section 2 Local Plan sought to widen the wording of Policy LPP25 to allow the delivery of specialist housing in accordance with Policy LPP35 at the site. This request was made in the context of the clear and evidence need for specialist housing for the elderly, which is not being adequately addressed elsewhere within the Borough. Furthermore, it is made in the context of clear advice from Essex County

Council regarding the need to expand the definitions at the site to include the elderly and infirm.

- 2.8 In the event that an alternative scheme for the site is brought forward which proposes a similar or enhanced level of specialist housing, the decision maker will need to review the proposals in the context of the policies of the Plan as a whole, including LPP35, which supports the provision of specialist housing in principle.
- 2.9 In this context, the decision maker would need to take account of the extent of the need for specialist housing against any minor conflicts with the wording of the allocation and weigh the associated benefits (including the benefits of an increased level of provision) against the harms. However, it would be helpful for the decision maker if the policy wording were to be brought more clearly into line with LPP35 and delete the wording 'for people with physical impairments and learning disabilities' from the policy. This would enable the decision maker to come to a swifter decision and ensure the delivery of much needed specialist housing is not delayed.
- 2.10 Furthermore, the wording of the policy would be further enhanced by reference to 'a minimum' of 16 units of specialist housing to allow the efficient use of the land in accordance with the remainder of the policy. Specialist housing is specifically designed to meet the needs of sectors of the population for whom normal market housing is unsuitable, or whose lives (physical health, mental health and beyond) are improved by access to housing that meets their day-to-day needs. It is by its very nature beneficial for a significant proportion of the population – both by providing suitable housing for those who need it, but also by freeing up normal market housing for those without specialist needs. Lewis & Scott specialises in the delivery of affordable retirement housing and the benefits associated with this form of housing are significant. As such, the benefits associated with the delivery of a greater quantum of specialist housing designed to support the needs of an ageing population at the site should not be precluded by the proposed allocation.
- 2.11 Following the allocation of the site and in the context of the extant planning permission at the site, there is no logical reason to exclude the full area of the site from the settlement boundary of Halstead. No cogent evidence for its exclusion has been provided and in the interests of integration of the site with the wider community the settlement boundary should be extended to encapsulate it.