

ISSUE 1 b.

Comments on the Follow up work in relation to the Examination into the King's Lynn and West Norfolk Local Plan: Site Allocations and Development Management Policies - Heacham, November 2015 (ref. FW24)

The Sustainability of Heacham as one of the largest Key Rural Service Centres is not in Question. The need for specialist accommodation for the elderly has not been questioned. However, the suitability of the site for meeting the need for accommodation for housing with care, a care home and market housing has been disputed by the LPA.

Please see enclosed Annex A – Video and Annex B – Site Photographs which help to demonstrate how the issues raised by the LPA would be addressed.

Please see proposed layout at Annex C.
Allocation G47.1 also abuts the boundary of the site.

The following sections in bold italics are extracts of the Borough Council's follow up work on Heacham in November 2015.

2.13 In addition to the above, the Council are proposing to allocate a 5 ha site in Hunstanton (site F2.3). Due to the high numbers of elderly population in the north of the borough, this area was identified in the Strategic Model of Care document as a priority area for additional provision. The Strategic Model of Care 2008 specifically references Hunstanton. The proposed allocation at F2.3 is of considerable size at 5 hectares and depending on the modelled employed, it is expected that the site is capable of accommodating a minimum of 60 housing with care units. This number is likely to increase if more flatted accommodation is delivered and if the Care Home element as per policy F2.3 of the SADMP is delivered on site F2.5 to which the policy within the SADMP permits.

- 1.1 Annex 1a of the Strategic Model of Care prepared by Norfolk County Council's Director of Adult Social Services, 13 October 2008, identified that "in the Hunstanton area there is a need for 521 care places in total. Currently there are 369 provided with a surplus of 166 long stay care home places but shortfalls of 29 short stay care, 70 dementia care home, 65 care home with nursing, 56 dementia care home with nursing and 98 housing with care places." This referenced the Hunstanton area rather than just Hunstanton, as claimed within paragraph 2.13 of the Borough Council's follow up work on Heacham. Paragraph F.2.33 of the Borough Council's Site Allocations and Development Management Policies Pre-Submission Document, January 2015, referred to the need for care home accommodation identified "in Hunstanton and the nearby villages of Heacham and Dersingham". It is reasonable to include Heacham within the Hunstanton area that is assessed within the Strategic Model of Care, 2008.

1.2 Paragraph D1.6 of the Borough Council's response to the Local Plan Inspector's Issues and Questions, June 2015, reported that: "Since the publication of the Strategic Model of Care reports no housing with care schemes have been provided in the Borough. Given the need identified, lack of existing provision in the north of the Borough and the high numbers of existing older persons in the north of the Borough the allocation of Housing with Care at F2.3 is fully justified and necessary. Without such allocation the housing and social care needs of the Boroughs significantly ageing population will continue to outstrip supply." The Borough Council's note that "such allocation" is necessary is crucial, as one can reasonably infer that further housing with care beyond that which the Borough Council hopes will be delivered in Hunstanton would be required to meet the chronic shortage of such accommodation.

1.3 A Statement of Common Ground for the land at site F2.3 and others in Hunstanton was signed by Pigeon Investment Management Ltd. on 02 July 2015 and by the Borough Council on 03 July 2015. At paragraph B1.1 of the Statement of Common Ground Pigeon Investment Management Ltd. did not agree to a number of the Borough Council's amendments to Policy 2.3. These were (not agreed sections underlined):

- [the site] is allocated principally for housing with care, with a supplementary allocation of general purpose market housing to aid viability.¹
- The mixed uses comprising –
 - At least 60 housing with care units;
 - Approximately 50 general housing units;
- Development of the site must be as part of a comprehensive scheme, which must be shown to bring forward the housing with care units. The final housing numbers are to be determined at the planning application stage to be informed by a design-led master planned approach.
- [Footnote 1] – There is an expectation that in line with good practice the scheme will include the provision of community facilities ie restaurant, retail (hairdressers/corner shop) and opportunities for social interaction.

1.4 Pigeon Investment Management Ltd. outlined the wording that they would be willing to accept. The proposed amendments are outlined below (amendments are **emboldened and underlined**):

- [the site] is allocated for housing with care **and** general purpose market housing to aid viability.³
- **The scheme will comprise –**
 - **approximately** 60 housing with care units;
 - **Approximately 60** general **purpose** housing units;
- The final housing numbers are to be determined at the planning application stage to be informed by a design-led master planned approach. **The allocation site will be planned in a comprehensive manner, which will include both the housing with care units and the general purpose housing.**
- [Footnote 3] **In** line with good practice the scheme **may therefore** include the provision of community facilities ie restaurant, retail (hairdressers/corner shop) and opportunities for social interaction.

- 1.5 Pigeon Investment Management Ltd. sought the following change to the wording of proposed policy F2.5 (amendment is **emboldened and underlined**):
- Land south of Hunstanton Commercial Park amounting to 1 hectare as identified on the Policies Map is allocated for employment use **(which could be met by the provision of a care home on the site or elsewhere within site F2.3 alongside housing with care as part of a care home complex)** subject to the following:
- 1.6 The proposed allocation at site F2.3 was examined by the Inspector at the Local Plan hearing on Tuesday 3 November 2015. The Borough Council and the landowner's agent remained unable to agree how the housing with care element of a development at site F2.3 would be delivered in conjunction with general purpose market housing to secure the delivery of housing with care on the site.
- 1.7 In proposed policy F2.3, the Borough Council refer to the site delivering housing with care. It is clear that the landowner of sites F2.3 and F2.5 and the Borough Council have not agreed on the delivery and the numbers of housing with care dwellings or on the delivery and location of the care home. Furthermore, the viability of the housing with care scheme has not been tested. Therefore, the deliverability of the housing with care units and the care home has not been secured in Hunstanton.
- 1.8 The viability of the housing with care and care home element of the proposed development at the Land off School Road, Heacham has been tested by Broadland Housing Group, who would deliver the scheme. This demonstrates the viability of this scheme (see the proposed site layout at annex C). The housing with care dwellings and care home are deliverable in Heacham.

2.14 ...As per above site F2.3 or site F2.5 is allocated for the provision of at least one care home.

- 1.8 The wording for proposed policies F2.3 and F2.5 makes no provision for a care home. The proposed policies submitted in January 2015 for this examination made no mention of a care home. The landowner's proposed statement of common ground mentions that site F2.5 has: "the potential for a care home on part (or all) of that allocation could support an interdependency between this and the housing with care element." The Borough Council has not agreed to this wording.
- 1.9 There is no certainty that a care home will be delivered on either site F2.3 or F2.5. There has been no proposal for more than one care home. There is no provision within the wording of either proposed policy that requires a developer to provide a care home. The claim above that these sites have been allocated for at least one care home is misleading.