

WOKING SITE ALLOCATIONS DPD – EXAMINATION HEARING STATEMENT

MATTER 2

WEST HALL, PARVIS ROAD, WEST BYFLEET

ON BEHALF OF ANCHOR HANOVER GROUP (AHG)

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1. INTRODUCTION

- 1.1 This Hearing Statement is submitted on behalf of Anchor Hanover Group in response to the Inspector’s Matters and Questions which were published on 14th October 2019 in advance of the forthcoming hearing sessions for the Woking Borough Council Site Allocations DPD examination. Pegasus Group have requested to be present at the hearing sessions scheduled for the 4th, 5th and 6th December 2019.
- 1.2 Anchor Hanover Group currently operate a Care Home at West Hall which is located in the open countryside between West Byfleet and Byfleet. The exact location is shown below.

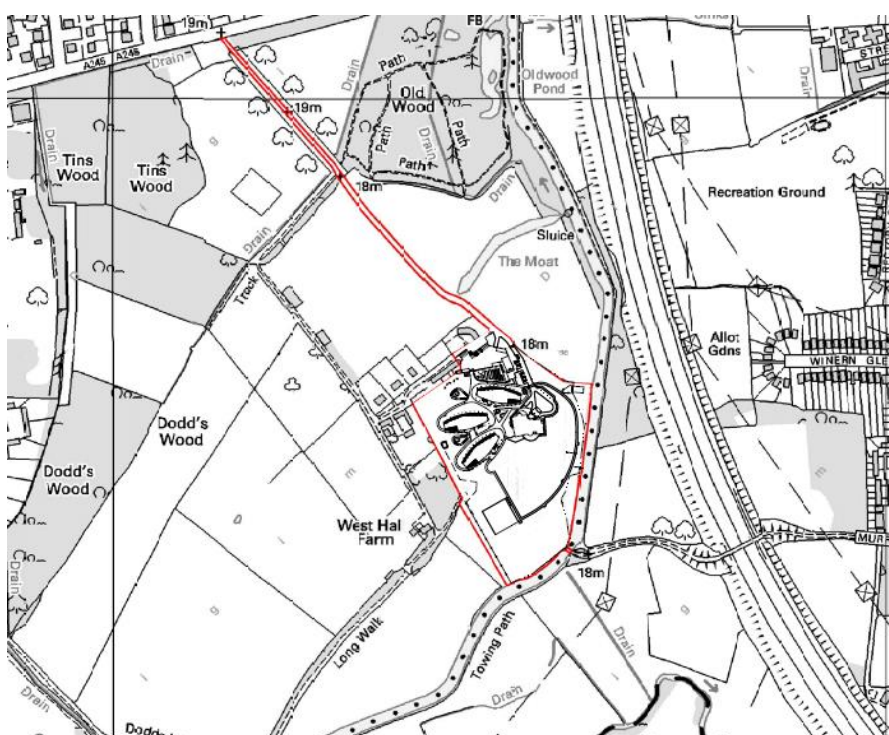


FIGURE 1 – SITE LOCATION PLAN EXTRACT

- 1.3 The Care Home facilities at this site are dedicated to residents with Alzheimers and other forms of Dementia and significant investment in recent years has led it to being considered among the best care facilities for Dementia Care in the Country. The quality of the care home is reflected in the fact that was rated 'Outstanding' for service by the Care Quality Commission in October 2016, scored 907/1,000 in the 2017/18 Residents Survey and won the Best Interior Dementia Design category at the National Dementia Care Awards.

1.4 The Care Home abuts the proposed allocation **GB10: Land Surrounding West Hall**. Whilst our client supports the principle of development at this site, they are keen to ensure that its need has been robustly justified and that it would not adversely affect the quality of care it delivers to its highly vulnerable patients, should it ultimately come forward.

1.5 This hearing statement specifically relates to Matter 2 and the following Issues/Questions:

- Issue ii
 - Question 2;
 - Question 3;
 - Question 6; and
 - Question 9.

2. ISSUE ii) QUESTION 2

Is the spatial distribution of development allocations in the SADPD in general conformity with the Core Strategy?

- 2.1 We note that the bulk of development has been directed toward previously developed land within the town, district and local centres which is broadly in line with the Core Strategy.
- 2.2 We note that the Council will need to demonstrate exception circumstances in order to justify the release of Green Belt within the borough to meet its housing requirement. Assuming the Inspector agrees that these have been demonstrated, the release of Green Belt land to meet the Council’s housing requirement is supported.
- 2.3 Whilst we have some concerns regarding the selection process for Green Belt land to be released, we do not object to the principle of its release to accommodate future housing needs, assuming these Exceptional Circumstances have been demonstrated.

3. ISSUE ii) QUESTION 3

Policy CS13 of the Core Strategy anticipates that sites would be allocated in the SADPD to meet specialist housing needs: to what extent does the SADPD fulfil this policy requirement?

- 3.1 Policy CS13 sets out the Council's approach to meeting the needs of older people and vulnerable groups. It states that the Council will support the development of schemes to meet this need in appropriate locations. The level of need will be reflected by evidence contained in the latest SHMA.
- 3.2 Our previous representations considered the content of the latest SHMA ([WBC/SA/E022](#)) and agreed with the findings at paragraph 9.46 that there is a need for 1,031 care home bed spaces to be delivered between 2013-2033. Of these, 393 care home bed spaces need to be delivered in Woking.¹ As confirmed at paragraph 10.53, this does not form part of the household population and so is separate to the need identified for housing.
- 3.3 Page 18 of the submission plan sets out the Council's approach to delivering specialist residential accommodation. Rather than allocate specific sites for specialist accommodation, the strategy appears to simply require allocated sites to deliver specialist accommodation on the allocated sites. The requirement for said sites to be in line with Policies CS11 and CS13 of the Core Strategy is considered to provide the requisite level of confidence that specialist accommodation will be delivered.
- 3.4 However, we do not consider this approach to be in line with Policy CS11 or CS13. The Council's approach is somewhat muddled at present as the need to comply with Policies CS11 and CS13 suggests that all of the identified sites should make some provision for specialist housing requirements. However, none of the identified sites make specific provision for Class C2 accommodation. Indeed, the delivery of specialist accommodation may not be appropriate on some of the proposed allocations. At present the Plan provides no assurances that C2 uses will be delivered alongside other residential development.
- 3.5 Furthermore, it does not appear as though the Council has given due consideration to the specialist housing needs for older people within the borough. Indeed, the

¹ (1,031 / 20) x 14.

SADPD appears to have ignored this issue. On page 18 of the submission Plan, it has not been explained how the specialist housing needs of older people have been identified or set out robust strategy to deal with this.

- 3.6 We would expect the Council to clearly identify what the specialist housing need is (taking into account newly formed *and* existing households) and prepare a strategy to meet this need. We would then expect either detailed site allocations to come forward to meet this need (as required by Policy CS11) or specific requirements within the site allocation policies that had been identified as suitable to deliver specialist housing for older people.
- 3.7 In its current form, the plan does not set out a sound approach to meeting the housing needs of older and vulnerable people. The Council will need to review its site allocations and identify specific instances where specialist accommodation will need to be delivered and identify, where necessary, additional site allocations to meet this identified need.

4. ISSUE ii) QUESTION 6

Does the SADPD allocations deliver a sufficient mix of sites to meet assessed needs for the size, type and tenure of housing for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)?

- 4.1 No. As we have highlighted above, we do not believe that the needs of older people have been given due consideration by the Council, nor do we consider the identified sites will be sufficient to deliver the required quantum of specialist/care-home housing required by the SHMA.
- 4.2 All extra-care/specialist/care-home accommodation will be expected to be delivered on sites alongside standard market housing. There is no scope within the plan for such schemes to come forward in isolation from other forms of development (other than through windfall sites). This does not allow sufficient flexibility to bring forward sites to meet the needs of older people to 2027.

5. ISSUE ii) QUESTION 9

Is the requirement for care homes and extra care accommodation appropriately reflected in the SADPD?

5.1 No.

Extra Care

5.2 Extra Care accommodation is considered within the SHMA under the umbrella term 'specialist housing for older persons'. In its conclusions on the required housing mix, the SHMA indicates that there is a need to accommodate 918 dwellings within Woking (Table 81).

5.3 We acknowledge that the delivery of this accommodation will be through the identified housing requirement and that it could not be met in full due to the same constraints that reduce the overall OAN from 517 dpa to 292 dpa. Given that this equates to a reduction of around 45%, we would expect the plan to contain policies to ensure around 500 specialist dwellings are delivered over the plan period (25dpa).

5.4 However, current policies are not adequately worded to deliver this, nor do they identify this specific need. Proposed site allocations should be identified where such accommodation would be most appropriate to be delivered and minimum percentages should be specified in relevant policies to ensure they are delivered.

5.5 Alternatively, specific allocations could be identified to deliver such housing.

Care Home Bed Spaces

5.6 The SHMA indicates a need for 1,031 care home bed spaces to be delivered between 2013-2033 within the West Surrey HMA, 393 of which should be delivered within Wokingham. This need is **in addition** to the general housing requirement and so needs to be planned for separately. The SADPD does not account for this need, nor does it identify specific sites where it should be delivered. The plan is, therefore, clearly deficient in this respect.

5.7 This need is based on a variety of factors, including the growth in the number of over 65s to 2033, specific health issues arising within this segment of the

population (e.g. increase in dementia/alzheimers sufferers) and existing households with a need for specialist accommodation.

- 5.8 This has not been accounted for within the SADPD and, therefore, we can only conclude that it has not accurately or appropriately reflected this need or set out an appropriate strategy to address it.

6. ISSUE ii) QUESTION 10

The Traveller Accommodation Assessment (TAA) pre-dates the publication of the Government's Planning Policy for Traveller Sites (PPTS). To what extent are the findings of the TAA consistent with the PPTS, particularly as the latter document introduced a new definition of the term "Traveller" for planning purposes?

- 6.1 We have no specific view on this matter. We simply would expect the Inspector to consider representations indicating whether this results in a greater, lesser or the same quantum of pitches to be provided over the plan period and update the relevant policies accordingly.