

Jenni Ball
The Planning Inspectorate
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06.04.21

Representation by Hoylake Community Planning Forum to planning application no out/20/01414 Erection of up to 61 assisted living apartments and up to 30 care bungalows and associated infrastructure works

Appeal Case Reference APP/W4325/W/21/3266888

Dear Ms Ball

In my capacity as Chair of Hoylake Community Planning Forum I am writing on behalf of the Management Group of the forum in response to the above application.

We wish to object to this application on the basis of its isolated location, flawed evidence of need and failure to align with objectives, priorities and policies in the current Neighbourhood Development Plan (NDP) for Hoylake.

We offer a balanced analysis and acknowledge where the proposals may align with the NDP.

## 1: ISOLATED LOCATION

A pressing concern is the location of the site, which is inaccessible by road for approximately 20 minutes of every hour during peak times because of the Hoylake railway crossing, with a risk rating of C6 (medium to high), 118 trains per day passing through, and with no vehicular access from the back of the site.

Given the likely age and disability profile of future residents, delays to emergency vehicle access would have a disproportionately harmful impact upon future occupants and exacerbate existing problems experienced by current residents. There would also be greater pressure on emergency services, increased traffic generated by social care staff as well as future residents and visitors, which would all affect living conditions for existing residents.

[We have been contacted by one local resident whose father passed away while waiting for an ambulance that could not cross the rail tracks while the barriers were down. Although emergency vehicles have priority access, in practice this can still cause a significant delay, depending on how much traffic is queued, whether the nearby roundabout is blocked, and where a train is at that point in time].

We consider that this isolated geographic location would lead to social isolation and lack of integration with the rest of the town and would socially exclude future residents, who would be living further away from shops and services than almost anyone else in Hoylake. Segregation on the grounds of age and/or disability is potentially unlawful.

# 2: FLAWED EVIDENCE OF NEED

Between 2015 and 2020, the general population rose by 3.3% (ONS).

In the same period, the number of those aged over 65 were expected to increase by 12% (1.1 million); those aged over 85 by 18% (300,000); and centenarians by 40% (7,000). (Political challenges relating to an aging population: Key issues for the 2015 Parliament)

Hoylake already has a higher than national average number of over 65s (22.4% or 2,600 in total). (2011 Census) This may explain in part why it has been anecdotally assumed that there is a greater than average need for extra and elderly care provision in Hoylake. However, we have surveyed existing provision in Hoylake and Meols (population 12,834) and found that current and future needs can be met for the foreseeable future.

### **ELDERLEY CARE PROVISION**

Name	Number of residents
The Anchorage	40
Cromer Court	36
Elm Tree Court	27
Hilbre House	22
Hoylake Cottage	62
Kings Gap	37
Meols Drive	12
Montrose Court	50
The Old Garden	40
Red Rocks	24
Sandtoft	22
WestHaven	52
The Woodlands	15
The Court	17
The Lodge	19
EXTRA CARE PROVISION	
Supported living for younger people with learning difficulties	53
Accommodation for people suffering from mental health difficulties	29
TOTAL	557

This represents 4.3% of the local population; an increase of 27% since 2011. (*Analysis of care home provision in Hoylake, HVL, 2011*)

There are 381,000 care home residents in the UK representing 0.6% of the population. (*University of Kent PSSRU: Provision of care home services in Britain 2012*). This would equate to 75 people from the population of Hoylake and Meols.

1.5% of the populace have dementia, 33% of whom require care home provision. (*Dementia – A state of the nation report on dementia care and support in England*). This would equate to 60 people from the population of Hoylake and Meols. However, the current number of dementia-suitable care home spaces in Hoylake and Meols is 250 (*Analysis of care home provision in Hoylake, HVL, 2011*).

# 3: NON ALIGNMENT WITH NDP OBJECTIVES, PRIORITIES AND POLICIES

We consider that the proposal would not be acceptable in Planning terms and would not accord overall with the following made NDP Policies or the NDP Vision Statement and Objectives. The proposals do not align with the NDP Vision Statement, which states (*inter alia*): "To support the town centre and the Carr Lane Industrial Estate as the foci for a wide range of easily accessible jobs".

Neither, for similar reasons, does it accord with NDP Objective 6, which states: "To ensure that Carr Lane Industrial Estate remains an attractive location for micro-enterprises and small and medium-sized enterprises that provide local jobs".

Although some additional jobs might be created in the social care sector, this proposal is not primarily employment development but, instead, residential. We are concerned that once the principle of residential development is accepted, the extra care element may be dropped in the future, so any employment justification would then be lost. Even if a condition is attached requiring extra care housing to be provided, this condition could be removed by application or on appeal.

Two NDP housing policies are relevant.

NDP Policy H1. reads:

### **H1. RESIDENTIAL DEVELOPMENT**

All proposals for new dwellings within the existing built-up area, including infilling, redevelopment, conversion and change of use of buildings or land to a residential use (Use Classes C1, C2, C3 and C4) will be supported, provided that they would accord with Policies DI2, DI3 and CL2 (where relevant) and would not have a significantly adverse effect upon the distinctive character of the local area or the living conditions of occupants of surrounding dwellings.

The site is immediately adjacent to NDP Masterplan area CL2, which states: "In the area defined as CL2 on the Proposals Map a comprehensive mixed-use redevelopment scheme, or individual proposals delivered as part of a phased masterplan approach will be permitted, subject to the strict controls upon development within the Green Belt and provided that:

- the living conditions of existing residents would be improved;
- the long term needs of businesses would be catered for, and
- any area in need of landscape renewal would be improved."

We consider this development would adversely affect the living conditions of existing residents.

Finally, the site is in the Green Belt. Although part of it is previously developed land, the proposal would amount to a residential incursion into open land. The NDP does not specifically support any urban extensions. It may also affect the ability of the land to perform its function as supporting habitat for birds.

#### 4: WHERE THE PROPOSALS MIGHT ALIGN WITH THE NDP

On the other hand, the proposal would help to meet Wirral's overall housing need, especially in relation to specialist housing.

So, it would generally accord with NDP Objective 1, which states: "To support the provision of additional housing, including affordable housing to meet the identified needs of the existing and future population".

It would also accord, to a limited degree, with NDP Policy H2, which reads:

#### H2. HOUSING TYPE AND TENURE

Proposals for residential development must ensure that where appropriate they address the housing needs of the wider community, by providing a mix of housing types, tenures and sizes, including affordable and specialist housing, based upon an up-to-date assessment of housing need.

Part of the site is previously developed land and the entire site is part of the "area requiring landscape renewal" UDP allocation (LA4).

Residential development would, to a limited degree, assist in rehabilitating this land.

### 5: CONCLUSION

On balance, we consider this application should be rejected because:

- The risk to life could be significant
- The risk of social isolation is high
- Current and future need in these areas is already satisfied
- The proposals do not align with a number of key objectives, priorities and policies of the NDP
- Pressure on existing services and infrastructure would increase
- The proposals would further imbalance the demographic of the town, adversely impacting future economic sustainability and affordability for younger people

Yours sincerely

Mark Howard

Chair

Hoylake Vision Community Planning Forum Management Group

6 April 2021