

14 August 2023
Our Ref: 19.5134

120 Bermondsey Street
London
SE1 3TX

Liz Harrison
Principal Planning Officer

T 0203 268 2018

By email only; Liz.Harrison@eastleigh.gov.uk

Dear Liz,

Re: Response to planning policy comments provided on planning application ref: F/22/93194 for development proposals at The Ageas Bowl, Marshall Drive, West End, Southampton, SO30 3XH

I write in response to comments provided by the Planning Policy Team, in relation to the acceptability of the proposed care home, which forms a key part of the development proposals at Ageas Bowl (as set out in planning application Ref. F/22/93194). These remarks were set out in the consultee response dated 6th February 2023, as well as in follow-up comments provided on 17th July.

On behalf of our clients Land & Development Advisory Ltd and RB Sports & Leisure Holdings Ltd, I explain below why the proposed care home is justified in planning terms and merits inclusion within the application proposals. I consider the overall strategic need for older persons accommodation, the supply of housing generally and specialist care accommodation as a component of that supply, and the suitability of the application site to help address this need.

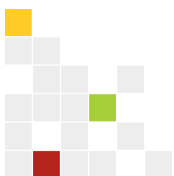
Strategic Need

The Council accept that there is a significant need for the provision of new specialist accommodation for older people within the Borough. This is clearly laid out within Policy DM25 of the adopted Local Plan 2016-2036 and the associated evidence base.

The supporting text to Policy DM25 sets out that, over the next twenty years, there will be an estimated increase of 24% in the number of people aged 65 and over living in the Borough, and an increase of 5% of people aged over 85 years. The trend is expected to lead to a corresponding increase (of some 24%) in the number of older people requiring appropriate accommodation.

Similarly, the Strategic Housing Market Assessment (SHMA) 2014 further sets out that a particular driver of housing need, over the period to 2036, will be a growing population of older persons. The SHMA further reiterates that this demographic change will see a requirement for additional levels of care/support, along with provision of specialist accommodation within the Borough.

Consistent with the Council's own analysis, the Care Home Needs Assessment, prepared by industry experts Carterwood, and submitted to support this application, calculates that there is a projected 'market standard care bed net need' (up to 2036) for 930 en-suite bedrooms within the market catchment area and a need for 484 en-suite bedrooms within the Local Authority area.



It is my assumption that the Planning Policy Team do not dispute the general need for specialist accommodation.

Current Housing Supply

The Council's latest published Five-Year Housing Land Supply Position Statement (dated August 2022) identified an overall housing supply of 5.1 years. However, an appeal decision issued in December 2022 (Land at Satchell Lane¹) concluded that the trajectory of deliverable housing sites had been overestimated by 337 homes, which (when removed) reduced the supply to 4.7 years.

Accordingly, the presumption in favour of sustainable development is activated in accordance with NPPF paragraph 11(d), and the weight afforded to Local Plan policies that seek to restrict the supply of housing is duly reduced. This applies to those aspects Policy WE4 that seeks to restrict housing development to certain parts of the Ageas Bowl site, including within the boundary of the Urban Area.

Moreover, the Council's own trajectory only identifies two sites that are expected to deliver specialist housing for older people, within the assessed 5-year period. These sites will provide a total of 198 bed spaces, which is the equivalent of 105 dwellings. Within this context and noting that the Local Plan did not expressly allocate sites for older people's accommodation, the LPA should welcome the opportunity to bring forward a new care home within the Urban Area Boundary.

The evidence submitted by the applicant (the Care Home Needs Assessment) provides further analysis regarding the supply of new care accommodation. This indicates that even when the proposed care home at Ageas Bowl became operational (assumed to be no earlier than 2026), there would still be an undersupply of 321 minimum market standard care home beds within the market catchment, and a shortfall of 124 beds within the Eastleigh Borough.

By 2036 these shortfalls are projected to rise to 930 and 484 minimum market standard care beds in the market catchment and Local Authority respectively, even when it is assumed all currently planned care homes (both granted and pending decision) are developed. By 2036, there is also expected to be a significant undersupply of dementia beds. This is estimated to amount to a shortfall of 488 beds within the market catchment area and 293 beds within the Local Authority Area.

Accordingly, the proposed care home at the Ageas Bowl would assist in meeting the existing and increasing shortfall of care beds in the Eastleigh Borough, and in the wider market catchment.

Suitability of the Application Site

There is a clear quantitative need for specialist care accommodation and a corresponding requirement to address this need through significant new supply. However, it is evidently not possible to demonstrate empirically that one site or another provides an appropriate location for a care home, as this is a subjective matter of planning judgement.

Nonetheless, in reaching that planning judgement, the starting point (in relation to the proposals at Ageas Bowl specifically) is that the site is located inside the boundary of the Urban Area, within

¹ PINS Ref. 3292580

which in all forms of residential development (including housing for older people) find support in principle.

Moreover, the Local Plan provides further support for the provision of older people's accommodation at Policy DM25. This indicates expressly that the Council will support proposals for such where a site is sustainable, accessible to public transport, proximate to local facilities and well-integrated into the community.

It is our position that all these criteria are met. The accessibility of the site and the availability of public transport is fully considered in the submitted Transport Assessment. Future residents will also benefit from particularly good access to the wide range of existing and proposed community facilities within the Ageas Bowl complex. Likewise, the care home is proposed in a location which is proximate to the 'general' Use Class C3 residential development, which forms part of the overall application.

Moreover, it is highly relevant in the context of the identified level of need (and the current failure to address that need through new supply) that there is market evidence that the proposed care home at Ageas Bowl is deliverable. Indeed, the letter of support prepared by the applicant's commercial agents, Avison Young, sets out their professional opinion that the proposed care home will offer an attractive location for prospective residents. Indeed, many residents who choose to reside in the care home will be attracted by its proximity to the golfing and cricket facilities at Ageas Bowl.

With respect of amenity, the care home represents a discrete 'micro-location', which will be set back from the stadium ring road, away from spectator flow on game days. The building elevations will also benefit from tranquil outlook towards the Telegraph Woods, golf course and training cricket pitch. The position of the 'L' shaped main building will also act as a buffer to the elderly residents' amenity, principally the communal landscaped area to the rear.

The care home units will offer a degree of self-containment for residents, as well as a significant level of secluded external amenity space, and the commercial agents have set out that the average age of residents is expected to be considerably higher than the minimum requirement. Because of this, residents are less likely to be highly mobile and will not often leave their immediate surroundings, without the aid of staff or visiting family. As such, the location is considered suitable to their needs.

We would be grateful if you could consider this response alongside the planning policy officer's comments in your assessment of the proposals. Nonetheless, this represents our final position on the matter.

Yours sincerely

Zoe Curran

Zoe Curran
Planner

Tel: 07704546601

Email: ZoeCurran@boyerplanning.co.uk

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