

DEVELOPMENT MANAGEMENT COMMITTEE REPORT – 12 Sept 2018

Application Number	3/18/1227/FUL
Proposal	Three-storey, 66-bedroom residential care home for older people (Use Class C2) with associated access, parking and landscaping.
Location	St Michael's Hurst Development Hazel End Road Bishop's Stortford
Parish	Bishop's Stortford
Ward	Bishop's Stortford Meads

Date of Registration of Application	30 May 2018
Target Determination Date	30 Sept 2018 (ETA)
Reason for Committee Report	Major application
Case Officer	Stephen Tapper

RECOMMENDATION

That planning permission be **GRANTED** subject to the conditions set out at the end of this report.

1.0 Summary of Proposal and Main Issues

1.1 The proposal is for a three-storey L-shaped building for LNT Care Developments on a prominent site next to a formal park adjacent to a main route and bus route through the development. As such, a high standard of design is required, including good access, parking and servicing arrangements. The architecture should be distinctive but compatible with the surrounding new residential development being undertaken by Countryside Properties.

- 1.2 Consideration must also be given to the location, which is away from local services and facilities; environmental matters including traffic management and surface water drainage; and to matters of social and economic sustainability in respect of the nature and purpose of the care home and any employment benefits.

2.0 Site Description

- 2.1 The site is within St Michael's Hurst, known until recently as ASR 5, its Local Plan notation within the urban extension of Bishop's Stortford North (BSN). The site of 0.41ha (1.01ac) is located on the north side of Kitchener Road, a secondary road, close to its junction with the main bus route, now named Morbury Avenue. The application site slopes gently from a high point in its north-western corner to a low point in its south-eastern corner. There are no trees or hedges on the site or on its boundaries.
- 2.2 The proposed L-shaped building has one long elevation alongside the western boundary of the recently completed "Central Park", a landscaped formal park on Morbury Avenue. The other long elevation looks towards a green wedge to the north that links Central Park to St Michael's Hurst itself, a large green area in the heart of the estate, which will be laid out within Phase C of the overall development.
- 2.3 The building would have one of its short external elevations looking towards houses on the opposite side of Kitchener Road to the south. The other elevations frame the car park and face proposed residential development on the western boundary that will be within Phase C of the Countryside development. (The Council is currently considering an outline application (3/18/0652/OUT) for Phase C).

3.0 Planning History

- 3.1 The following planning history is of relevance to this proposal:-

Application Number	Proposal	Decision	Date
3/13/0886/OP	An urban extension comprising 329 new dwellings (of a range of sizes, types and tenures, including affordable housing), including a site for a one-form-entry primary school, and public open and amenity space, together with associated landscaping, access, highways (including footpaths and cycleways), parking, drainage (including a foul water pumping station), utilities and service infrastructure works), all matters reserved except for vehicular access	Approved with conditions and section 106 agreement	01/06/16
3/18/0652/OUT	Outline application for up to 260 dwellings (of a range of sizes, types and tenures, including affordable housing) and a care home (Use Class C2) of up to 66 beds together with public open and amenity space, associated landscaping, highways (including footpaths and cycleways), parking, drainage, utilities and service infrastructure works, with all matters reserved.	Not yet determined	

4.0 **Main Policy Issues**

- 4.1 These relate to the relevant policies in the National Planning Policy Framework (NPPF), the East Herts District Plan 2018 (DP), the adopted East Herts Local Plan 2007 (LP) and the Bishop's Stortford Silverleys and Meads Neighbourhood Plan (NP).

Main Issue	NPPF 2018	LP policy	DP policy	NP policy
Specialist housing	Para 61		HOU1 HOU6	HDP6 HP2
Design, landscaping and planning out crime	Para 127	ENV1, 2 ENV3 ENV11	DES3 DES4	GIP4, HDP2 HDP3
Access, parking, travel plans, cycling facilities	Ch 9	TR2, 4, 7, 14	TRA1, 2,3	TP1
Surface water drainage	Para 165	ENV21	WAT5	
Sustainable development	Ch 2	SD1	INT1	

Other relevant issues are referred to in the 'Consideration of Relevant Issues' section below.

5.0 **Summary of Consultee Responses**

- 5.1 HCC Highway Authority The principle of a care home on the ASR5 site is acceptable and can be accommodated in terms of trip generation on the surrounding local highway network. The revised layout now incorporates turning space for refuse/service vehicles and can accommodate a fire tender, and it incorporates a drop off point and a turning area (shown hatched as a no parking area). The Authority has also requested a s.106 contribution towards a community based transport scheme.
- 5.2 Lead Local Flood Authority No objection subject to confirmation of post development run-off rates and volumes.

- 5.3 EHDC Engineering Advisor Additional information required regarding on-site surface water attenuation and connections into the approved drainage system designed in accordance with the ASR5 flood risk strategy.
- 5.4 Thames Water No objections
- 5.5 HCC Historic Environment Unit The site falls within an area in which Countryside Properties have undertaken archaeological investigation, the results of which are to be published. There are no further comments.
- 5.6 HCC Minerals and Waste No objections subject to a condition requiring a site waste management plan.
- 5.7 EHDC Environmental Health Advisor No objections subject to conditions regarding the control of noise, odour and lighting; a construction management plan and unsuspected contamination.
- 5.8 EHDC Operational Services Concern regarding bin haul distance and the turning circle for a 12.1m freighter.
- 5.9 Herts Police Crime Prevention Advisor says the applicant has taken note of national and local crime prevention policy and the only comments relate to entrance door surveillance, external lighting and boundary fencing.
- 5.10 Herts Fire and Rescue requires the provision of fire hydrants in accordance with the County's section 106 toolkit.

6.0 Town Council Representations

- 6.1 No objections

7.0 Summary of Other Representations

7.1 The application has been advertised as a major development and neighbour notification letters were despatched but no third party representations have been received.

8.0 Consideration of Issues

8.1 Specialist housing. The National Planning Policy Framework 2018 (NPPF) states that Councils should plan for the size, type and tenure of housing needed for different groups in the community, including older people.

8.2 Para. 14.2.3 of the District Plan says a key issue for East Herts is its ageing population. Population forecasts show that there will be 87.5% more older people (65+) by 2037. The largest increase within the 65+ group is those aged over 85, a 189.6% increase, which potentially means a significant increase in the need for support services and housing with support. Policy HOU1(iii) therefore says *Where appropriate, provision of specialist housing will be encouraged for older people and vulnerable groups in accordance with Policy HOU6 (Specialist Housing for Older and Vulnerable People).*

8.3 People who are unable to live independently require specialist residential or nursing care accommodation. This type of accommodation usually falls within the C2 Use Class. Therefore, in addition to the overall housing target, the District Plan (Policy HOU6) supports a gross increase of at least 530 bed-spaces of C2 provision in the District's towns, primarily to help meet the accommodation needs of older people who need to live in an environment which provides residential or nursing care. Policy HOU6 goes on to say that such housing should be located where there is access to a choice of sustainable travel options including being within easy reach of town centre shops and services. Providers should also consider the integration of healthcare facilities within their development.

- 8.4 The proposed development is therefore one that is supported in principle by planning policy at national and local level. The location will be served by the 510 bus, which is planned to re-route through St Michael's Hurst, and there will be footpath links to new open spaces and the riverside and to the proposed Eastern Neighbourhood Centre in Stortford Fields. However, healthcare facilities are not currently included in the development.
- 8.5 Design, landscaping and planning out crime. The site is located adjacent to a recently completed formal park near to the main entrance to St Michael's Hurst. The opportunity must be taken to create a building of a design that will attract attention and be a landmark within the estate but at the same time respect the traditional architectural styling and palette of external materials of residential properties that are being constructed in the locality.
- 8.6 The building is L-shaped to allow the residents of the two wings of bedroom accommodation to easily access a central core comprising a lounge/dining room on each floor overlooking green space; a large reception area on the ground floor behind the main entrance; a first floor shop, hair salon and gallery tea room with a balcony over the main entrance; and a library and office on the second floor. Operational uses such as the kitchen, laundry, staff room and clinic occupy the whole of the ground floor of the shorter wing. The longer wing includes three "quiet" lounges and a garden room over its three floors. The 66 residents are therefore well served by on-site services and common areas.
- 8.7 The bedrooms are all of similar layout, with a floor area of 15sq.m, excluding their en suite shower rooms. There are two lifts between all floors. A number of ground floor rooms have an external door to the gardens.
- 8.8 As a consequence of the L-shaped layout of the building and its location next to two open spaces, all the elevations have a public face. It is considered that all elevations are to a high standard of design. Also as a consequence of the layout, the main entrance occupies the inner angle of the "L" and is less visible from public

viewpoints. This leaves the wings with long and potentially unrelieved elevations. The solution has been to construct the east and west elevations in bays, with alternate bays projecting forwards slightly under a gabled roof. These break up the roof line and the alternating bays are finished in different materials.

- 8.9 Amended plans have been submitted that reduce the amount of grey cladding used in favour of brickwork, there being two contrasting brick colours. Those bays that are in brick will include brick and stone features to add interest. The north and east elevations also now include canopies over the entrances to ground floor bedrooms, with an artificial slate covering to match the main roof of the building.
- 8.10 Additional drawings have been submitted to show full details of ancillary buildings in the grounds: an electricity meter house/garden store and a sprinkler house, both in brick with tiled roofs; a timber bin store and a steel cycle park.
- 8.11 As regards landscaping, there is the opportunity to create landscaped gardens around two sides of the building and the submission of detailed landscaping plans is covered by condition 6. The formal park will also add to the quality of the building's setting. Details have been submitted of the boundary enclosure, which will comprise steel railings 1.8m in height, in black with a scalloped design.
- 8.12 Policy HDP3 requires that new development must achieve *Secured by Design* accreditation. By its nature, the care home raises issues of security and the Crime Prevention Advisor's concerns regarding surveillance and controls at the main door, the means of enclosure of the site and the quality of the external lighting have been considered by the applicant. In respect of lighting, the applicant does not wish to use column lighting, as suggested by the Advisor, on the basis that it can cause nuisance to neighbouring properties. Instead, the applicant proposes low energy wall mounted spotlights, angled to provide light over the building and immediately

surrounding footpaths. In addition, bollard lighting would be used in the car park and other paths away from the building footprint.

- 8.13 In respect of the concerns raised regarding door surveillance and boundary treatments, it is also considered that these are satisfactorily addressed, both by the internal arrangement of spaces within the building and by the boundary materials proposed.
- 8.14 Traffic and parking. The applicants emphasise that, based on their experience elsewhere, residents would generally be expected to come from a catchment of no more than 3 miles radius, or be associated with relatives or friends resident within that catchment. The care home would predominantly serve the Bishop's Stortford area and employees would generally be drawn from the local area, therefore mitigating the impact of the proposals on traffic. It is estimated that the home would create approximately 46 new jobs and an analysis of the shift pattern indicates there is unlikely to be more than 15 staff on site at any one time.
- 8.15 The shift patterns also show that the morning and evening peaks will be little affected by the staff arrivals and departures. The company operates staff travel planning, as a result of which the majority of staff use public transport. Currently, the nearest bus stop is on Michael's Road, a five minute walk away, but it is intended that the 510 will be re-routed through the wider residential site and stop very close to the proposed care home. There are also options for staff to car share, walk and cycle. A detailed travel plan has been submitted with the application.
- 8.16 As regards the residents, few if any would have a car. There are no restrictions on visiting hours and, as a result, there are only moderately busy times: at weekends and between 18:00 and 20:00 on weekdays. Again, therefore, there would be little impact on peak traffic flows.

- 8.17 Regarding parking provision, the site layout plan includes 18 car spaces in front of the main entrance, which the applicant has based on the experience of developing a large number of homes across the country. LNT describes several precedents where parking surveys were conducted and they are described in the application. They show that even at busy times the car parks were not full.
- 8.18 The Council's own *Vehicle Parking Standards SPD, Appendix B, (2008)* and the *Updated Parking Standards* that accompany the District Plan indicate that 0.25 spaces per resident bed space should be provided, which would be 17 spaces rounded up. The applicant is proposing 18 spaces, based on experience elsewhere and that should therefore be satisfactory. The application also includes a shelter for 8 bicycles for staff and visitors.
- 8.19 In response to comments from the Highway Authority and the Council's Operational Services, an amended plan has been submitted showing how a turning space can be provided within the car park, suitable for both a fire tender and a waste services vehicle (so addressing the concern regarding bin haul distances) as well as a daily delivery vehicle.
- 8.20 Surface water drainage. Countryside Properties conducted a Flood Risk Assessment across the whole of Stortford Fields and a drainage solution was designed accordingly. Owing to ground conditions and the slope of the land there was limited opportunity for on-site storm water attenuation in accordance with best practice, but there are one or two existing watercourses and permeable hard surfacing is being used. The main opportunity to attenuate the flow of storm water before it flows into the river is via the provision of three attenuation ponds in Bat Willow Park, on the south eastern side of Hazel End Road, which have now been constructed. They will also act as filter beds.
- 8.21 The care home is a large building, with an extensive roof area and probably less garden area than would have been the case if the site was developed with individual dwelling houses. Therefore, the Lead Local Flood Authority (LLFA) requires confirmation of the post-

development run-off rates and volumes for the care home site in order to ensure that storm water will be attenuated in accordance with District Plan Policy WAT5, which requires development to achieve greenfield run-off rates, with the surface water run-off managed as close to its source as possible. The Council's Engineer has suggested there should be opportunities to improve the amount of on-site attenuation by means of a balancing pond and permeable surfaces. The necessary storm water calculations to satisfy the LLFA and the EHDC Engineer and any additional means of on-site attenuation (excluding an infiltration pond for health and safety reasons) are required by condition 20 below.

- 8.22 Other Matters. Comments were made by consultees in relation to the requirement for a site waste management plan and to tenure the provision of fire hydrants. With regard to these issues concerns have been met by additional information from the applicant or will be covered by conditions.

9.0 Planning Balance and Conclusion

- 9.1 The proposed care home is a change to the previously expected use of the site, which was the development of individual homes in common with the rest of St Michael's Hurst. This report has therefore considered a number of matters that distinguish the care home development from the surrounding residential development.
- 9.2 The proposal is compliant with Local Plan and District Plan policy. The application includes information regarding the social, economic and environmental impact of the care home. As regards the social impact, the care home will meet a clearly identified need for such accommodation in East Herts and Bishop's Stortford in particular, given that most residents will move in from their existing homes in the locality. The application drawings show accommodation of a high standard, with plenty of shared space internally and an efficient layout from the resident's point of view. There is no integrated health facility other than the on-site nurse's clinic. However, in terms of the impact on local health services, given that

the majority of residents will be from the locality, there should be a positive rather than negative impact.

- 9.3 Policy generally encourages the integration of care homes in their communities. Whilst the care home is not in close proximity to a neighbourhood or town centre, it is likely that in view of their age and infirmities, residents would not generally make use of such services, or if they do they will be taken their by their visitors. There are attractive open spaces adjacent to the care home, which are accessible to residents, subject to their degree of mobility and which also provide a pleasant outlook from the building. In terms of the social impact of the care home the weighted balance is therefore very much in favour of it.
- 9.4 As regards the economic impact, the home will employ 46 people with a variety of skill sets and it is likely that most would live in the Bishop's Stortford area. It is also likely that the home will procure some of its goods and services locally. The home will have *Secured by Design* accreditation. The home will therefore have a positive economic impact.
- 9.5 The environmental impacts are mainly limited to traffic, potential noise and odours from extraction and air conditioning plant and the visual impact in the street scene. The application provides evidence that despite the number of residents and staff in the home the traffic impact will be very limited, including in the peak hours. Off-street parking and turning facilities are satisfactory and there is likely to be only one delivery vehicle per day. The applicant will encourage modal shift away from the car by offering staff a tried and tested travel plan. The Highway Authority's request for a s.106 contribution towards a community based transport scheme is noted but having regard to the nature of the development it is considered unlikely the many occupiers of the care home would utilise such a service. It is therefore considered that such a contribution would not meet the tests in the CIL Regulations and cannot be justified.

- 9.6 Given the proximity of the home to other residential property, the potential for noise and other nuisance has been carefully considered by the Council's Environmental Health Service and, subject to a number of planning conditions being imposed, it has no objection to the proposals.
- 9.7 In terms of the environmental impact of design, the proposal offers the opportunity to construct a landmark building at St Michael's Hurst. The applicant has responded to requests to amend the external appearance of the building since the application was submitted and, taking account also of the landscaping opportunities, Officers are confident that the development will be of pleasing and distinctive appearance and at the same time sit well with the architecture of the surrounding residential development. The development will therefore have very limited adverse environmental impact.
- 9.8 The conclusion is therefore that the weighted balance is very much in favour of granting planning permission for the care home which will have very limited adverse environmental impact and very positive social and economic impacts. It is also recommended that a condition is placed on the planning permission restricting the use within Use Class C2 to that of a care home because other uses within C2 such as residential schools, colleges or training centres, hospitals and nursing homes may have very different impacts in terms of traffic and parking and the amenities of surrounding residential properties.

RECOMMENDATION

That planning permission be **GRANTED** subject to the conditions set out below:

Conditions

1. Three year time limit (1T12)
2. Approved plans (2E10)

3. Samples of materials (2E12)
4. The building shall be used for the purposes of residential accommodation and care to people in need of care and for no other purpose including any other purpose within Class C2 of the Town and Country Planning (Use Classes) Order 2005 (as amended).

Reason

Other uses within the Use Class may not be acceptable within this residential location in terms of their impact on traffic, transport and parking and in terms of the environmental impact given the location of the site in close proximity to residential properties.

5. Prior to the commencement of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the Local Planning Authority. These details shall include: (a) hard surfacing materials; (b) planting plans; (c) written specifications (including cultivation and other operations associated with plant and grass establishment); (d) schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate; and (e) implementation timetables. Thereafter the development shall proceed in accordance with the approved details.

Reason

To ensure the provision of amenity afforded by appropriate landscape design, in accordance with policies ENV1, ENV2 and ENV11 of the East Herts Local Plan Second Review April 2007.

6. Landscape works implementation (4P13)
7. Lighting details (2E27)
8. Provision and retention of parking spaces (3V23)
9. Prior to any hereby permitted use commencing, a scheme shall be submitted for approval to the Local Planning Authority to demonstrate that the rating level of sound emitted from any fixed plant and/or machinery associated with the development shall not

exceed a level 5dB(A) below the existing background sound levels at the any sound sensitive premises. All measurements shall be made in accordance with the methodology of BS4142 (2014) (Method for rating and assessing industrial and commercial sound) and/or its subsequent amendments.

Reason

In order to ensure an adequate level of amenity for residents of the nearby new dwellings in accordance with policies ENV1 and ENV25 of the East Herts Local Plan Second Review April 2007.

10. Prior to any hereby permitted use commencing, a scheme containing full details of arrangements for internal air extraction, odour control, and discharge to atmosphere from cooking operations, including any ducting and flues, shall be submitted to and approved in writing by the local planning authority. The works detailed in the approved scheme shall be installed in their entirety before the use hereby permitted is commenced. The equipment shall thereafter be maintained in accordance with the manufacturer's instructions and operated at all times when cooking is being carried out unless otherwise agreed beforehand in writing with the local planning authority.

Reason

In order to ensure an adequate level of amenity for residents of the new dwellings in accordance with policies ENV1 and ENV25 of the East Herts Local Plan Second Review April 2007.

11. Construction Management Plan (6N07)
12. Construction hours of working - plant and machinery (6N07)
13. Before commencement of use of the care home, all access and junction arrangement serving the development shall be completed in accordance with the approved in principle plan (CM232FN - A03-E), and constructed to the specification of the Highway Authority and Local Planning Authority's satisfaction.

Reason

To ensure that the access is constructed to the current Highway Authority's specification as required by the Local Planning Authority and to comply with those policies of the development plan.

14. Before commencement of use of the care home, the proposed access, as shown on approved in principle drawing number CM23 2FN - A03-E shall incorporate tactile paving crossing points, with details to be supplied to and approved in writing by the Local Planning Authority, in consultation with the Highway Authority

Reason

In the interests of amenity and pedestrian safety.

15. Prior to the commencement of use of the care home, a visibility splay shall be provided in full accordance with the details indicated on the approved plan number CM23 2FN - A03-E. The splay shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway.

Reason

In the interests of highway safety.

16. Hard surfacing (3V21)

17. Before first occupation or use of the development, the access roads, drop-off point and parking areas as shown on the approved plan (drawing number CM23 2FN - A03-E) shall be provided and shall be maintained thereafter.

Reason

To ensure the development makes adequate provision for the off street parking, drop-off/pick up for emergency vehicles and manoeuvring of vehicles likely to be associated with its use.

18. Prior to the commencement of the development, a Construction Traffic Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Traffic Management Plan shall identify details of:

- phasing for the development of the site, including all highway works;
- methods for accessing the site, including construction vehicle numbers and routing
- location and details of wheel washing facilities; and
- associated parking areas and storage of materials clear of the public highway.

Reason

To ensure that the development takes place in a comprehensive manner having due regard for highway safety and capacity and to ensure that the impact of construction traffic on the local road network is minimised.

19. No part of the development hereby permitted shall be occupied prior to the implementation of the approved Travel Plan dated May 2018 (or implementation of those parts identified in the approved Travel Plan as capable of being implemented prior to occupation). Those parts of the approved Travel Plan that are identified therein as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

Reason

To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment.

20. Prior to the commencement of the development details of a surface water drainage scheme shall be submitted to and approved by the Local Planning Authority that will
- i. provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters; and
 - ii. provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other

arrangements to secure the operation of the scheme throughout its lifetime.

The approved scheme shall thereafter be implemented to the satisfaction of the local planning authority prior to the first occupation of the development hereby approved.

Reason

In the interests of the management of surface water flows and in accordance with Policy ENV21 of the East Herts Local Plan Second Review, April 2007 and national planning policy guidance set out in section 10 of National Planning Policy Framework.

Informatives

1. Other legislation (OL01)
2. Unsuspected contamination (33UC)
3. Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>
4. Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit

mud, slurry or other debris on the highway. Further information is available via the website: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

Summary of Reasons for Decision

East Herts Council has considered the applicant's proposal in a positive and proactive manner with regard to the policies of the Development Plan (Minerals Local Plan, Waste Core Strategy and Development Management Policies DPD 2012 and the 'saved' policies of the East Herts Local Plan Second Review April 2007); the National Planning Policy Framework and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015. The balance of the considerations having regard to those policies is that permission should be granted.

KEY DATA**Residential Development**

Land use		
	Bed spaces	Floor area
Residential institution	66	3441sq.m.

Residential Vehicle Parking Provision

Current Parking Policy Maximum Standards (EHDC 2007 Local Plan)

Parking Zone	4	
Residential unit size (bed spaces)	Spaces per unit	Spaces required
Elderly persons residential and nursing homes (66 beds)	0.25	16.5
Total required		16.5
Proposed provision		18.0

Emerging Parking Standards (endorsed at District Plan Panel 19 March 2015)

Parking Zone	4	
Residential unit size (bed spaces)	Spaces per unit	Spaces required
Elderly persons residential and nursing homes (66 beds)	0.25	16.5
Total required		16.5
Accessibility reduction		N/A
Resulting requirement		16.5
Proposed provision		18

Legal Agreement - financial obligations

None